

**BONNELL ALUMINUM, INC.**

**POST CLOSURE CARE PERMIT RENEWAL APPLICATION**

**MARCH 29, 2024**

**RENEWAL APPLICATION REVISION 2**

**MAY 16, 2025**

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## **TABLES**

| <b>TABLE 4-1: CHEMICALS IN BONNELL ALUMINUM, INC. PROCESSES</b><br><b>Bonnell Aluminum, Inc., Newnan, Georgia</b><br><b>PCC Permit Renewal Application, 2024</b> |                                                                                           |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------|
| <b>ALUMINUM ALLOY CHEMICALS</b>                                                                                                                                  |                                                                                           |
| Aluminum                                                                                                                                                         | Magnesium                                                                                 |
| Chromium                                                                                                                                                         | Manganese                                                                                 |
| Copper                                                                                                                                                           | Silicon                                                                                   |
| Iron                                                                                                                                                             | Titanium                                                                                  |
| Lead                                                                                                                                                             | Zinc                                                                                      |
| <b>ANODIZING CHEMICALS</b>                                                                                                                                       |                                                                                           |
| <b>COMMON OR TRADE NAME</b>                                                                                                                                      | <b>CHEMICAL NAME</b>                                                                      |
| Sodium Acetate Buffer                                                                                                                                            | Acetic acid                                                                               |
| Caustic soda                                                                                                                                                     | Sodium hydroxide                                                                          |
| Diammonium phosphate                                                                                                                                             | Diammonium phosphate                                                                      |
| Nitric acid                                                                                                                                                      | Nitric acid                                                                               |
| Sulfuric acid                                                                                                                                                    | Sulfuric acid                                                                             |
| HOUGHTO-COLOR A-597                                                                                                                                              | Stannous Sulfate                                                                          |
| Methanol                                                                                                                                                         | Methanol                                                                                  |
| HOUGHTO-SEAL A-620                                                                                                                                               | Nickel compounds                                                                          |
| HOUGHTO-ETCH AX-1897                                                                                                                                             | Proprietary – no hazardous chemicals on SDS                                               |
| HOUGHTON A-720                                                                                                                                                   | Proprietary – no hazardous chemicals on SDS                                               |
| HOUGHTO-SEAL A-638                                                                                                                                               | Proprietary – no hazardous chemicals on SDS                                               |
| SODIUM PERIODATE 10.69 G/L                                                                                                                                       | Proprietary – no hazardous chemicals on SDS                                               |
| HOUGHTO-CLEAN A 1090                                                                                                                                             | Alkylated naphthalene sulfonate, sodium salt                                              |
| HOUGHTO-CLEAN A-1083                                                                                                                                             | Disodium tetraborate pentahydrate                                                         |
| HOUGHTODEOX A 1714                                                                                                                                               | Disodium peroxodisulphate                                                                 |
| HOUGHTO-DEOX A-1724                                                                                                                                              | Soluble Iron Salt, Nitric Acid, Phosphoric Acid, Sulfuric Acid                            |
| HOUGHTO-ETCH AX-2050                                                                                                                                             | Ammonium hydrogendifluoride                                                               |
| HOUGHTON A-710                                                                                                                                                   | Nonylphenol, branched, ethoxylated; Polyethylene glycol mono(octylphenyl) ether phosphate |
| HOUGHTO-SEAL A-635                                                                                                                                               | Potassium Hydroxide                                                                       |
| HOUGHTO-SEAL A-672                                                                                                                                               | Potassium Hydroxide                                                                       |

Prepared by/Date: MPL/02-18-2024  
Checked by/Date: JEC/03-15-2024

**TABLE 4-2: SOLID WASTE MANAGEMENT UNITS (SWMU)**  
**Bonnell Aluminum, Inc., Newnan, Georgia**  
**PCC Permit Renewal Application, 2024**

| SWMU NUMBER | SWMU DESCRIPTION                                                        | APPROXIMATE OPERATIONAL DATES                                      | APPROXIMATE DIMENSIONS/CAPACITY                                      | FUNCTION/DESCRIPTION                                                                                                                                                                                                                                                                                | MATERIALS/CHEMICALS                                                                                                                                     |
|-------------|-------------------------------------------------------------------------|--------------------------------------------------------------------|----------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1           | Calcium Aluminate Landfill                                              | 1972 to 1992                                                       | 4 acres X 15 ft deep                                                 | Land disposal unit for vacuum filtered waste from the process recovery of caustic etching solution.                                                                                                                                                                                                 | Calcium aluminate, caustics                                                                                                                             |
| 2           | Chromium Hydroxide Sand Drying Beds                                     | 1970 to 1989                                                       | 40 ft X 15 ft X 5 ft deep                                            | RCRA Regulated Unit. Received clarified sludge (FO19) from aluminum chemical conversion coating wastewater treatment.                                                                                                                                                                               | See Section 4.3                                                                                                                                         |
| 3           | Chromium Hydroxide Landfill                                             | 1980 to 1989                                                       | 1 acre x 8 ft deep                                                   | RCRA Regulated Unit. Land disposal unit for sludge from Chromium Hydroxide Sand Drying Beds.                                                                                                                                                                                                        | See Section 4.3                                                                                                                                         |
| 4           | Surface Impoundment (Settling Pond & Polishing Pond)                    | Settling Pond: Early 1960s to 1991<br>Polishing Pond: 1972 to 1991 | 1 acre                                                               | RCRA Regulated Unit. Settling pond portion received non-clarified, pH adjusted, polymerized wastewater from anodizing wastewater treatment. Acted as a clarifier. Contains FO19 sludge. Polishing pond portion on unit received supernate and some sludge from Settling Pond. Contains FO19 sludge. | See Section 4.3                                                                                                                                         |
| 5           | Not Used (reserved)                                                     |                                                                    |                                                                      |                                                                                                                                                                                                                                                                                                     |                                                                                                                                                         |
| 6           | Aluminum Hydroxide Land Treatment Unit                                  | 1971 to 1991                                                       | 5.6 acres x 6 ft deep<br>1.6 acres x 3 ft deep<br>38.5 acre-ft total | RCRA Regulated Unit. Land application area for thesludge (FO19) from the Settling Pond. Area includes four aluminum hydroxide sand drying beds                                                                                                                                                      | See Section 4.3                                                                                                                                         |
| 7/46        | Tank Farm Unit                                                          | 1970 to 1995 Documented Release in July 1990                       | 5000 gallons                                                         | Solvents from the paintline cleaning are stored for less than 90 days before being reclaimed by an outside contractor. Secondary containment since 1989. Virgin Toluene solvent tank released near 1000 lbs to the air and soil.                                                                    | Paint pigments, xylene, toluene, Sol-150                                                                                                                |
| 8           | Temporary FO19 Drum and Roll-Off Container Storage Area                 | 1989                                                               | 50 ft X 100 ft<br>50 ft X 50 ft                                      | Areas used for temporary storage (60 days) of FO19 sludge prior to offsite disposal.                                                                                                                                                                                                                | FO19 sludge                                                                                                                                             |
| 9           | Roll-Off Container Storage Area, CrOH Sludge Tank and CrOH Filter Press | 1989 to Present                                                    | 60 ft X 20 ft                                                        | Concrete, curbed and roofed area beneath filter press that receives sludge from the conversion coatingwastewater clarifier.                                                                                                                                                                         | FO19 sludge - See Section 4.3                                                                                                                           |
| 10          | Paintline Wastewater Treatment System and all piping                    | 1970 to Present                                                    |                                                                      | Collects and treats wastewater that results from preparation of aluminum for painting. Includes two PVC lined 5500 gallon basins for reducing hexavalent chromium, adjusting pH, and polymer mixing; a clarifier; associated piping; and a pipe from the clarifier to the NPDES outfall.            | Aluminum, chromic acid, hydrofluoric acid, isopropyl alcohol, phosphoric acid, sodium hydroxide, lime, organic polymer, sodium bisulfite, sulfuric acid |

**TABLE 4-2**

**TABLE 4-2: SOLID WASTE MANAGEMENT UNITS (SWMU)  
Bonnell Aluminum, Inc., Newnan, Georgia  
PCC Permit Renewal Application, 2024**

| <b>SWMU<br/>NUMBER</b> | <b>SWMU DESCRIPTION</b>                                                                       | <b>APPROXIMATE<br/>OPERATIONAL<br/>DATES</b> | <b>APPROXIMATE<br/>DIMENSIONS/CAPACITY</b> | <b>FUNCTION/DESCRIPTION</b>                                                                                                                                                           | <b>MATERIALS/CHEMICALS</b>                                                                                       |
|------------------------|-----------------------------------------------------------------------------------------------|----------------------------------------------|--------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------|
| 11                     | Anodizing Wastewater Treatment System and Piping Upstream of Settling Pond                    | 1971 to Present                              |                                            | Collects and treats wastewater from anodizing process tanks. Includes two 20,000 gallon pH neutralization tanks and all collection pits and piping downstream of the anodizing tanks. | Aluminum, hydrogen peroxide, nickel acetate, nitric acid, sodium hydroxide, sulfuric acid, lime, organic polymer |
| 12                     | Truck Shop Sump plus Piping and Trench                                                        | 1975 to Present                              | 1000 gallons                               | Underground concrete tank that receives floor washings, waste oil and solvents from shop.                                                                                             | Waste oils, solvents and detergents                                                                              |
| 13                     | Truck Shop Pipe Discharge                                                                     | 1975 to 1990                                 | 50 ft X 50 ft                              | Formerly received supernatant from truck shop oil/water separator. Mostly clear liquid was discharged. Oily discharge was covered and mixed with soil.                                | Water and oily mixtures                                                                                          |
| 14                     | Truck Shop Parking Area                                                                       | 1975 to 1987                                 | Approx. 3 acres                            | Received waste oil from oil/water separator for dust control.                                                                                                                         | Waste oils                                                                                                       |
| 15                     | Area Under Truck Shop Oil/Water Separator                                                     | 1987 to Present                              | 15 ft X 20 ft                              | Receives spills from overflow and during removal of waste oils and supernatant from separator.                                                                                        | Water and oily mixtures                                                                                          |
| 16                     | Storage Yard Behind Maintenance plus Ditch and Drum Storage                                   | 1970 to Present                              | 2 acres                                    | General use for metal parts storage with a 20 ft X 50 ft storage area for empty drums.                                                                                                | Scrap metal parts, empty drums that held process and wastewater treatment chemicals (See SWMU Nos. 10 and 11).   |
| 17                     | Drum Crusher Area                                                                             | 1975 to Present                              | 20 ft X 20 ft                              | Used to compact steel drums that are not refilled.                                                                                                                                    | Paint, caustics, acids, nickel acetate, oil                                                                      |
| 18                     | Storm Sewer System That Conducted Hydraulic Oils, Acids, Caustics, Solvents Including Ditches | 1954 to 1970                                 |                                            | Piping and the open creek/ditch that received oil leaks from hydraulic presses, storm water and process wastewater. Since 1970, system only received storm water.                     | Hydraulic oil, storm water, solvents, acids, caustics                                                            |
| 19                     | Area West of Die Shop                                                                         | 1975 to Present                              | 80 ft X 20 ft                              | Open ground area that received discarded metal filings and petroleum coolant, and graphite.                                                                                           | Steel, carbon, petroleum hydrocarbon (dielectric oil)                                                            |
| 20                     | Discharge Areas from Fabrication Building                                                     | 1966 to Present                              | Several small                              | Open ground areas that receive welding cooling water and rinseate from aluminum fabrication operations.                                                                               | Welding cooling water                                                                                            |
| 21                     | Former Oil/Water Separator Near Fabrication Building                                          | 1980 to 1990                                 | 100 ft X 40 ft                             | Received oil leaked from hydraulic presses. Supernatant went to Settling Pond. Waste oil handled by outside contractor. Soil berms for containment.                                   | Hydraulic oil                                                                                                    |
| 22                     | Active Oil/Water Separator                                                                    | 1990 to Present                              | 70 ft X 50 ft                              | Same description as SWMU No. 21 above with the addition of concrete secondary containment and concrete truckloading pad.                                                              | Hydraulic oil                                                                                                    |

**TABLE 4-2**

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**PCC Permit Renewal Application, 2024**

| SWMU NUMBER | SWMU DESCRIPTION                                                                            | APPROXIMATE OPERATIONAL DATES | APPROXIMATE DIMENSIONS/CAPACITY               | FUNCTION/DESCRIPTION                                                                                                                              | MATERIALS/CHEMICALS                                   |
|-------------|---------------------------------------------------------------------------------------------|-------------------------------|-----------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------|
| 23          | Inactive Oil/Water Separator                                                                | 1972 to 1985                  | 50 ft X 20 ft                                 | Positioned to intercept creekwater that carried hydraulic oil, storm water and process wastewater discussed with SWMU No. 18.                     | Hydraulic oil, storm water, solvents, acids, caustics |
| 24          | Reported Trash Dump (shown on 1966 topo)                                                    | Early 1950s to                | 0.5 acres                                     | Apparently received municipal and domestic waste materials.                                                                                       | Debris, paper waste, other unknowns                   |
| 25          | Reported Trash Dump Near Chromium Hydroxide Landfill                                        | Prior to 1970                 | 0.5 acres                                     | Apparently received municipal and domestic waste materials.                                                                                       | Home garbage and other unknowns                       |
| 26          | Demolition/Construction Debris Disposal Area                                                | 1972 to Present               | 2 acres                                       | Opened to receive large construction debris exclusively.                                                                                          | Concrete, bricks, asphalt, lumber                     |
| 27          | Acid Spill Area Near Phosphoric Acid Storage                                                | 1958 to Present               | 50 ft X 10 ft                                 | Concrete area cracked and degraded by acid spills.                                                                                                | Phosphoric acid                                       |
| 28          | Scrubbers Serving Fabrication Building                                                      | 1975 to Present               | 2 areas<br>20 ft X 20 ft                      | Removes particulates from carbon cutting operations. Solids accumulate in area. Scrubbing water was discharged to surface.                        | Carbon, water, particulates                           |
| 29          | Steam Cleaner Area                                                                          | 1970 to Present               | 50 ft X 30 ft                                 | Machinery and mobile equipment are cleaned on concrete apron. Runoff to Settling Pond until new treatment system was installed in fall of 1991.   | Detergents, oils, grease and dust                     |
| 30          | Battery Recharge Stations                                                                   | 1970 to Present               | 3 areas<br>8 ft X 15 ft                       | Acid lead batteries for electric fork lifts are removed/installed and recharged. Concrete sumps containing limestone are below recharge stations. | Sulfuric acid                                         |
| 31          | Paintline Spill Area                                                                        | 1970 to Present               | 2 ft X 30 ft                                  | Soil and gravel adjacent to building that received paint that seeped down outside wall of building.                                               | Wet paint, solvents                                   |
| 32          | Old Melter Burial Areas (3 areas) - Casting Offices, West of Settling Pond, Near Truck Shop | 1965 to 1980                  | 3 locations<br>30 ft X 30 ft X 10 ft          | Disposal sites for non-functional melting furnaces.                                                                                               | Steel, aluminum, fire brick                           |
| 33          | Fork Lift Shop Oil Sump                                                                     | 1970 to Present               | 200 gallons                                   | Concrete sump used to collect waste oils from fork lifts/repairs and maintenance. Sump contents are removed by outside recycling contractor.      | Waste oils and solvents                               |
| 34          | Exterior Trash Containers (3)                                                               | Late 1960s to Present         | 3 containers<br>2 X 8 cu yds<br>1 X 40 cu yds | Receive plant and paper trash that goes to Coweta County Landfill.                                                                                | Paper, cardboard, empty containers, scrap metal, etc. |

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|------------------------|------------------------------------------------------------------------------|----------------------------------------------|--------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------|
| 35                     | Sink Frame Building Area                                                     | 1953 to 1970                                 | 220 ft X 80 ft                             | Building and area that contained the initial aluminum extrusion business. Included paint and fabrication processes.                                                                                 | Paint, solvents, caustics, acids                                                                               |
| 36                     | Sump Below Paint Booths                                                      | 1970 to Present                              | 2 cylindrical sumps<br>4 ft diam X 16 ft   | Abandoned sumps that formerly housed hydraulic units. The sumps are no longer used but could receive wastewater and solvents. The sumps are periodically emptied to the waste solvent storage tank. | Solvents and paint                                                                                             |
| 37                     | Fabrication Building<br>Cooling Tower Discharge<br>Ditch                     | 1972 to Present                              | 50 ft X 10 ft                              | Cooling tower blows down discharges to open ditch.                                                                                                                                                  | Hydrogen peroxide, 1-H-methylbenzotriazole, potassium hydroxide, zinc salts, organophosphate, sodium bisulfite |
| 38                     | Discharge Areas from<br>Sinks Not Connected to<br>Sanitary or Process Sewers | 1960 to Present                              | Several small areas<br>< 10 sq ft          | Receives wastewater from employee hand washings. Discharges to storm water sewer or ground surface.                                                                                                 | Wastewater containing soap, oil, grease, other unknowns                                                        |
| 39                     | Former Employee Parking<br>Lot                                               | 1955 to 1970                                 | 1.5 acres                                  | Received waste oil for dust control. The area surface was paved with concrete in 1970.                                                                                                              | Waste oil                                                                                                      |
| 40                     | Buffing Dust Area in<br>Fabrication Building                                 | 1970 to 1980                                 | 50 ft X 30 ft                              | Open ground area that received buffing dust prior to expansion of building. Area is now covered by a concrete floor.                                                                                | Aluminum oxide, glycerides, fatty acids, ethanol, animal fats, water                                           |
| 41                     | Paint Hook Burn-Off Oven                                                     | 1989 to Present                              | 20 ft X 20 ft                              | Building with concrete floor and apron containing a furnace used to remove paint from metal paint hooks.                                                                                            | Paint ash, volatile organics                                                                                   |
| 42                     | Cooling Tower Areas (6<br>areas)                                             | 1960 to Present                              | Each Tower Area<br>15 ft X 25 ft           | Areas received spills from cooling towers.                                                                                                                                                          | Hydrogen peroxide, 1-H-methylbenzotriazole, potassium hydroxide, zinc salts, organophosphate,                  |
| 43                     | Former Die Shop Waste<br>Oil/Solvent Area                                    | 1960 to 1972                                 | 15 ft X 75 ft                              | Open ground area that received waste oil and solvents generated from die making machinery maintenance and die making. Area paved with concrete after 1972.                                          | Waste oil and solvents                                                                                         |
| 44                     | Chromium Hydroxide Sand<br>Drying Beds Closure<br>Stockpile Area             | 1990                                         | 200 ft X 50 ft                             | Temporary (60 days) polyethylene lined area for soil and debris storage prior to shipment offsite. Area was bermed and covered.                                                                     | FO19 sludge, chromium, fluoride                                                                                |
| 45                     | Container Cleaner Unit                                                       | 1985 to Present                              | 10 ft X 20 ft                              | Covered above-ground steel 300 gallon tank in which die parts are chemically cleaned.                                                                                                               | Aluminum, sodium hydroxide                                                                                     |
| 47                     | Underground Storage Tank                                                     | Documented<br>Release in July<br>1990        | 10,000 Gal. Tank.                          | Tank stores diesel for mobile equipment, trucks.                                                                                                                                                    | Diesel fuel                                                                                                    |

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| SWMU NUMBER | SWMU DESCRIPTION                | APPROXIMATE OPERATIONAL DATES | APPROXIMATE DIMENSIONS/CAPACITY                                            | FUNCTION/DESCRIPTION                                                                                                                      | MATERIALS/CHEMICALS                                                                                                                                     |
|-------------|---------------------------------|-------------------------------|----------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------|
| 48          | Paintline Pit                   | 1986 to 1987                  | Pit Area:<br>9 Ft. by 70 Ft.<br>Release area:<br>Small Cracked/Eroded Area | Unknown quantity of hexavalent chromium released to the soil due to crack in the concrete pit beneath the pretreatment system.            | Aluminum, chromic acid, hydrofluoric acid, isopropyl alcohol, phosphoric acid, sodium hydroxide, lime, organic polymer, sodium bisulfite, sulfuric acid |
| 49          | PCE Degreasing Unit             | 1954 to 1957                  | 50 Gal. Liquid                                                             | Tank vaporized PCE to degrease extrusions. Sludge containing PCE was probably discharged to soil and/or the storm sewer system (SWMU 18). | Tetrachloroethylene (PCE), trichloroethylene (TCE), buffing dust (aluminum oxide, tallow)                                                               |
| 50          | F019 Spill area                 | Discovered in December 1991   | 2 cubic yards                                                              | Spill was discovered in the Calcium Aluminatelandfill area.                                                                               | F019 Sludge                                                                                                                                             |
| 51          | Oil Changing Area               | 1994                          | 200 Ft. by 100 Ft.                                                         | Area where vehicle and maintenance equipment oil was changed                                                                              | Petroleum hydrocarbons and BTEX                                                                                                                         |
| 52          | Pipe Disposal Area              | 1994                          | 200 Ft. by 75 Ft.                                                          | Pipe and piping type debris was buried within this SWMU.                                                                                  | VOCs and Permit Metals                                                                                                                                  |
| 53          | Furnace Foundation in Casting   | Prior to 1980                 | 20 ft x 30 ft                                                              | Support of the casting part of the furnace                                                                                                | Refractory, aluminum dross, and aluminum inside a steel shell that was the bottom of an old aluminum melting furnace for 6XXX series alloy              |
| 54          | Hydraulic Oil Storage Tank Area | Prior to 2014                 | 18 ft x 34 ft                                                              | Stored hydraulic oil for the presses and mobile equipment.                                                                                | Hydraulic Oil                                                                                                                                           |
| 55          | Die Repair Process              | Prior to 2014                 | 40 ft x 40 ft                                                              | Clean press dies                                                                                                                          | Caustic                                                                                                                                                 |

Note:

1. Information contained in this table taken from the 2014 Permit Renewal Application.

Prepared by/Date: MPL/02-18-2024  
Checked by/Date: JMB/02-29-2024

**TABLE 4-3: HISTORICAL RELEASES**  
**Bonnell Aluminum, Inc., Newnan, Georgia**  
**PCC Permit Renewal Application, 2024**

| SWMU # | LOCATION / DESCRIPTION                                                                       | MEDIA CONTAMINATED                | IMPACT ON THE ENVIRONMENT                                                                     | DATE OF RELEASE | MATERIAL RELEASED                                   | WASTE CHARACTERIZATION                                                                              | APPROXIMATE AMOUNT OF RELEASE |
|--------|----------------------------------------------------------------------------------------------|-----------------------------------|-----------------------------------------------------------------------------------------------|-----------------|-----------------------------------------------------|-----------------------------------------------------------------------------------------------------|-------------------------------|
| 2      | Chromium Hydroxide Sand Drying Beds                                                          | Soil, Ground Water                | See Section 7                                                                                 | 1970 to 1989    | Leachate containing Trivalent Chromium and Fluoride | See Section 7                                                                                       | Unknown                       |
| 13     | Truck Shop Pipe Discharge Area                                                               | Soil                              | Groundwater may have been affected as down gradient wells 31 and 32 show xylene contamination | 1975 to 1990    | Oily Wastewater                                     | Water with trace amounts of motor oils. Composite soil sample confirms TPH and xylenes.             | Unknown                       |
| 15     | Area Under Truck Shop Oil/Water Separator                                                    | Soil                              | Down gradient well 24 showing no VOC's.                                                       | 1987 to 1995    | Oily Wastewater                                     | Motor oils and water as supported by soil composite showing TPH's and xylenes.                      | Unknown                       |
| 17     | Drum Crusher Area                                                                            | Soil                              | [Discrete unit to be addressed in RFI].                                                       | 1975 to 1995    | Paint, Caustics, Acids, Oil                         | BTEX, TPH found in soil samples (see September 19, 1991 data submittal and Appendix L for SWMU 16). | Unknown                       |
| 18     | Storm Sewer System that Conducted Hydraulic Oil, Acids, Caustics, Solvents Including Ditches | Soil, Ground Water, Surface Water | [See VOC Assessment]. Release groundwater.                                                    | Prior to 1970   | Oils, Solvents, Acid, Caustics                      | Hydraulic Oil, acids, caustic, solvent [See VOC Assessment]                                         | Unknown                       |
| 19     | Area West of Die Shop                                                                        | Soil                              | Graphite, oil, steel to soil.                                                                 | Prior to 1990   | Steel, Carbon, Dielectric Oil                       |                                                                                                     | Unknown                       |
| 20     | Discharge Areas from Fabrication Building                                                    | Soil                              | Well 44S & 44D do not indicate metals or VOC contamination                                    | 1965 to 1995    | Welding Cooling Water                               | Welding cooling water, rinsate from aluminum fabrication operations. No known hazardous compounds.  | 10 gal/day                    |



**TABLE 4-3: HISTORICAL RELEASES**  
**Bonnell Aluminum, Inc., Newnan, Georgia**  
**PCC Permit Renewal Application, 2024**

| SWMU # | LOCATION / DESCRIPTION                                                       | MEDIA CONTAMINATED | IMPACT ON THE ENVIRONMENT                                                                           | DATE OF RELEASE     | MATERIAL RELEASED                                                                                                     | WASTE CHARACTERIZATION                                                                                                                  | APPROXIMATE AMOUNT OF RELEASE |
|--------|------------------------------------------------------------------------------|--------------------|-----------------------------------------------------------------------------------------------------|---------------------|-----------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------|-------------------------------|
| 21     | Oil/Water Separator Adjacent to Fabrication Building to Fabrication Building | Soil               | [See "Waste Oil Tanks/Separator Soil Excavation Report," Appendix L)                                | 1980 to August 1990 | Waste Oil                                                                                                             | Hydraulic oils and water as supported by soil analyses (see SES report: "Waste Oil Tanks/Separator Soil Excavation Report," Appendix L) | Unknown                       |
| 27     | Acid Spill Area Near Phosphoric Acid Storage                                 | Soil               | pH of groundwater not adversely affected as shown in wells 33D and 41D *                            | 1958 to 1995        | Acid                                                                                                                  | Phosphoric acid                                                                                                                         | Unknown                       |
| 28     | Scrubbers Serving Fabrication Building                                       | Soil               | Wells 44S & 44D do not indicate metals or VOC contamination                                         | 1975 to 1995        | Water, Carbon                                                                                                         | Water, Carbon                                                                                                                           | Up to 9000 gal/day            |
| 29     | Steam Cleaner Area                                                           | Soil               | These constituents not found in downgradient wells 27S & 27D. *                                     | 1970 to 1995        | Oily Water, Detergents,                                                                                               | Motor fuel and oil and detergents as supported by soil sample composite showing TPH, Xylenes, Toluene, chloroform, chloroform           | Unknown                       |
| 31     | Paintline Spill Area                                                         | Soil               | These constituents not found in downgradient wells 27S & 27D. The nearby spring may be intercepting | 1970 to 1995        | Wet Paint, Solvents                                                                                                   | Paints, Toluene, Xylene                                                                                                                 | Unknown                       |
| 37     | Fabrication Building Cooling Tower Discharge Ditch Tower Discharge Ditch     | Soil               | [Discrete unit to be addressed in RFI]                                                              | 1972 to 1995        | Blowdown Water Peroxide, 1-H-methyl-benzotriazole, Potassium Hydroxide, Zinc Salts, Organophosphate, Sodium Bisulfite | Non-contact cooling tower water.                                                                                                        | 50 gal/day                    |
| 38     | Sinks Not Connected to Sanitary or Process Sewers or Process Sewers          | Soil               | Releases to groundwater unknown                                                                     | 1960 to 1995        | Wastewater with Soap, Oil, Grease                                                                                     | Water, detergent, oil                                                                                                                   | 50 gal/day                    |
| 39     | Former Employee Parking Lot                                                  | Soil               | Downgradient wells 26S & 26D show no BETX constituents. *                                           | 1955 to 1970        | Waste Oil                                                                                                             | Light oils used for dust control.                                                                                                       | Unknown                       |

TABLE 4-3: HISTORICAL RELEASES  
Bonnell Aluminum, Inc., Newnan, Georgia  
PCC Permit Renewal Application, 2024

| SWMU # | LOCATION / DESCRIPTION                                            | MEDIA CONTAMINATED | IMPACT ON THE ENVIRONMENT              | DATE OF RELEASE | MATERIAL RELEASED                                                                                                                                                                                                          | WASTE CHARACTERIZATION                                                  | APPROXIMATE AMOUNT OF RELEASE |
|--------|-------------------------------------------------------------------|--------------------|----------------------------------------|-----------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------|-------------------------------|
| 40     | Buffing Dust Area in Fabrication Building<br>Fabrication Building | Soil               | Releases to groundwater unknown        | 1970 to 1980    | Buffing Compound                                                                                                                                                                                                           | Tallow, abrasives (clay, aluminum oxide, aluminum dust)                 | Unknown                       |
| 42     | Cooling Towers (6 areas)                                          | Soil               | [Discrete unit to be addressed in RFI] | 1960 to 1995    | Blowdown Water including Hydrogen Peroxide, 1-H-methyl-benzotriazole, Potassium Hydroxide, Zinc Salts, Organophosphate, Sodium Bisulfite benzotriazole, Potassium Hydroxide, Zinc Salts, Organophosphate, Sodium Bisulfite | Noncontact and 1 contact (with aluminum) towers. [See RFA, Appendix L]. | Unknown                       |

**TABLE 4-3: HISTORICAL RELEASES**  
**Bonnell Aluminum, Inc., Newnan, Georgia**  
**PCC Permit Renewal Application, 2024**

| SWMU # | LOCATION / DESCRIPTION                                                         | MEDIA CONTAMINATED | IMPACT ON THE ENVIRONMENT              | DATE OF RELEASE | MATERIAL RELEASED          | WASTE CHARACTERIZATION                                                                                    | APPROXIMATE AMOUNT OF RELEASE |
|--------|--------------------------------------------------------------------------------|--------------------|----------------------------------------|-----------------|----------------------------|-----------------------------------------------------------------------------------------------------------|-------------------------------|
| 43     | Former Die Shop Waste Oil/<br>Solvents Disposal Area<br>Solvents Disposal Area | Soil               | [Discrete unit to be addressed in RFI] | 1960 to 1972    | Waste Oil, Solvents        | Waste oils, solvents                                                                                      | Unknown                       |
| 45     | Container Cleaner Unit                                                         | Soil               | [Discrete unit to be addressed in RFI] | 1985 to 1995    | Aluminum, Sodium Hydroxide | Caustic. A composite soil sample showed a pH of 9.0.                                                      | Unknown                       |
| 46     | Solvent Tank Farm                                                              | Soil, Air          | Releases to groundwater unknown        | September 1989  | Toluene                    | Toluene release. Soil samples indicate BTEX and PCE. See Soil Gas Survey in Appendix G, (RFA Appendix L). | 1000 lbs                      |

**TABLE 4-3: HISTORICAL RELEASES**  
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**PCC Permit Renewal Application, 2024**

| SWMU # | LOCATION / DESCRIPTION        | MEDIA CONTAMINATED                | IMPACT ON THE ENVIRONMENT                           | DATE OF RELEASE | MATERIAL RELEASED                                                                                           | WASTE CHARACTERIZATION                                                                     | APPROXIMATE AMOUNT OF RELEASE |
|--------|-------------------------------|-----------------------------------|-----------------------------------------------------|-----------------|-------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------|-------------------------------|
| 47     | Underground Storage Tank      | Soil                              | Tank tightness test indicated leak. Okay on retest. | July 1990       | Diesel Fuel                                                                                                 | Diesel Fuel                                                                                | 3 to 4 gallons                |
| 48     | Paintline Pit                 | Soil                              | Releases to groundwater unknown                     | 1986 to 1987    | Wastewater containing Chromic Acid, Hydrofluoric Acid, Isopropyl Alcohol, Phosphoric Acid, Sodium Hydroxide | Dilute acids (chromic, hydrofluoric, phosphoric), sodium hydroxide, and isopropyl alcohol. | Unknown                       |
| 49     | Degreasing Unit               | Soil, Ground Water, Surface Water | [See VOC Assessment]. Release to groundwater.       | Prior to 1970   | Oils, Solvents, Acid, Caustics                                                                              | PCE, TCE, Buffing Dust (Tallow, Aluminum oxide, Aluminum dust)                             | Unknown                       |
| 50     | F019 Spill Area               | Soil                              | Releases to groundwater unknown                     | Unknown         | F019 Sludge                                                                                                 | F019 Sludge                                                                                | 2 cubic yds                   |
| 51     | Oil Changing Area             |                                   |                                                     |                 |                                                                                                             |                                                                                            |                               |
| 52     | Pipe Disposal Area            |                                   |                                                     |                 |                                                                                                             |                                                                                            |                               |
| 53     | Furnace Foundation in Casting | None                              | None                                                | Unknown         | Refractory, aluminum dross and aluminum                                                                     | Material was disposed of as non-hazardous waste or reused in the facility                  | Unspecified                   |

**TABLE 4-3: HISTORICAL RELEASES**  
**Bonnell Aluminum, Inc., Newnan, Georgia**  
**PCC Permit Renewal Application, 2024**

| <b>SWMU #</b>                    | <b>LOCATION / DESCRIPTION</b>                        | <b>MEDIA CONTAMINATED</b>         | <b>IMPACT ON THE ENVIRONMENT</b> | <b>DATE OF RELEASE</b> | <b>MATERIAL RELEASED</b>              | <b>WASTE CHARACTERIZATION</b>                                                                                     | <b>APPROXIMATE AMOUNT OF RELEASE</b>                                                              |
|----------------------------------|------------------------------------------------------|-----------------------------------|----------------------------------|------------------------|---------------------------------------|-------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------|
| 54                               | Hydraulic Oil Storage Tank Area                      | Soil                              | Releases to groundwater unknown  | Unknown                | Hydraulic Oil                         | Visibly stained soils were excavated until Aroclor 1254 concentrations in confirmation samples were below 1 mg/kg | Unspecified                                                                                       |
| 55                               | Die Repair Process                                   | Soil                              | Releases to groundwater unknown  | Unknown                | Caustic                               | Soils exceeding a pH of 9 were excavated                                                                          | Unspecified                                                                                       |
| <b>Non-SWMU related Releases</b> |                                                      |                                   |                                  |                        |                                       |                                                                                                                   |                                                                                                   |
| N/A                              | Truck Shop Parking Lot                               | Soil                              |                                  | 1975 to 1987           | Waste Oil                             |                                                                                                                   | Unknown                                                                                           |
| N/A                              | Paintline Waste Filter Press                         | Soil                              |                                  | 8/22/1997              | F019 Sludge                           |                                                                                                                   | 2 gallons                                                                                         |
| N/A                              | Groundwater Collection Tank                          | Soil                              |                                  | 12/15/1997             | F001                                  |                                                                                                                   | 500 gallons                                                                                       |
| N/A                              | Casting, Chlorine Storage                            | Surface water puddled on concrete |                                  | 1/8/1998               | Chlorine gas/liquid                   |                                                                                                                   | 15-20 pounds                                                                                      |
| N/A                              | Recovery Well 7                                      | Soil                              |                                  | 1/15/1998              | F001                                  |                                                                                                                   | 800 gallons                                                                                       |
| N/A                              | Pretreat Chemicals, Wet Paint Area                   | Soil                              |                                  | 1/22/1998              | Pretreat Chemicals                    |                                                                                                                   | Unknown                                                                                           |
| N/A                              | Groundwater Collection Tank                          | Soil                              |                                  | 1/28/1998              | F001                                  |                                                                                                                   | 10 gallons                                                                                        |
| N/A                              | Groundwater Collection Tank                          | Soil                              |                                  | 2/9/1998               | F001                                  |                                                                                                                   | 570 gallons                                                                                       |
| N/A                              | Wastewater Treatment Plant                           | Surface Water                     |                                  | 4/4/1998               | Anodizing Sludge                      |                                                                                                                   | Unknown                                                                                           |
| N/A                              | Groundwater Collection Tank                          | Soil and Surface Water            |                                  | 8/16/1998              | F001                                  |                                                                                                                   | 500 gallons                                                                                       |
| N/A                              | Paintline Pit                                        | Soil and Surface Water            |                                  | 6/22/1999              | Chromic Acid in Water                 |                                                                                                                   | 20 pounds                                                                                         |
| N/A                              | Bonnell and Henry Streets/Paintline Wastewater       | City Sewer                        |                                  | 6/4/2004               | Dilute Chrome-Free Conversion Coating |                                                                                                                   | 50 gallons                                                                                        |
| N/A                              | Caustic Etch Storage Tank - Environmental Department | Soil                              |                                  | 11/21/2004             | Sodium Hydroxide and Sodium Aluminate |                                                                                                                   | 200-400 gallons of solution, 100 lbs of sodium hydroxide and 67 lbs of sodium aluminate estimated |
| N/A                              | Stormwater Ditch Located South of Parking Area       | Soil and Surface Water            |                                  | 10/1/2005              | Treated Wastewater                    |                                                                                                                   | 100 gallons                                                                                       |
| N/A                              | Empty Drum Storage Located South of Main Building    | Soil                              |                                  | 2/8/2006               | Hydraulic Oil                         |                                                                                                                   | 18 gallons                                                                                        |
| N/A                              | Die Repair and Ditch Behind Maintenance Area         | Soil and Surface Water            |                                  | 2/28/2006              | Caustic (12-25% solution)             |                                                                                                                   | 100 gallons                                                                                       |
| N/A                              | Etch Storage Tank in Environmental Department        | Soil and Surface Water            |                                  | 8/25/2006              | Sodium Hydroxide (5% solution)        |                                                                                                                   | 43 gallons                                                                                        |
| N/A                              | Etch Storage Tank in Environmental Department        | Soil and Surface Water            |                                  | 8/30/2006              | Sodium Hydroxide (5% solution)        |                                                                                                                   | 600 lbs sodium hydroxide                                                                          |

**TABLE 4-3: HISTORICAL RELEASES**  
**Bonnell Aluminum, Inc., Newnan, Georgia**  
**PCC Permit Renewal Application, 2024**

| <b>SWMU #</b> | <b>LOCATION / DESCRIPTION</b>                                    | <b>MEDIA CONTAMINATED</b>                | <b>IMPACT ON THE ENVIRONMENT</b> | <b>DATE OF RELEASE</b> | <b>MATERIAL RELEASED</b>                                      | <b>WASTE CHARACTERIZATION</b> | <b>APPROXIMATE AMOUNT OF RELEASE</b>    |
|---------------|------------------------------------------------------------------|------------------------------------------|----------------------------------|------------------------|---------------------------------------------------------------|-------------------------------|-----------------------------------------|
| N/A           | Paintline Pretreatment to Storm Ditch                            | Soil and Surface Water                   |                                  | 9/15/2006              | Dilute sodium and potassium hydroxides                        |                               | 343 lbs of mixed hydroxides             |
| N/A           | Paint Building (on top of)                                       | Soil and Surface Water                   |                                  | 10/8/2008              | Hydraulic Oil                                                 |                               | 8-15 gallons                            |
| N/A           | Truck Scale at Security Gate                                     | Soil and Surface Water                   |                                  | 11/11/2009             | Diesel Fuel                                                   |                               | 5-10 gallons                            |
| N/A           | Water Recycle System                                             | Soil and Surface Water                   |                                  | 6/26/2011              | 100% Caustic and Ammonium Bifluoride                          |                               | < 0.5 lbs                               |
| N/A           | Groundwater Treatment System                                     | Soil                                     |                                  | 12/11/2011             | Groundwater (~50 ug/L PCE and TCE)                            |                               | Approximately 1,000 gallons (< 1 g PCE) |
| N/A           | Boneyard                                                         | Soil                                     |                                  | 5/29/2012              | Paint Booth Drippings                                         |                               | ~ 5 gallons                             |
| N/A           | Near Equalization Basin at Wastewater Treatment                  | Soil                                     |                                  | 9/20/2012              | 25% Caustic and Sodium Aluminate Solution                     |                               | 800 lbs Caustic                         |
| N/A           | Near R-48                                                        | Soil                                     |                                  | 1/18/2013              | 25% Caustic and Sodium Aluminate Solution                     |                               | 133 lbs Caustic                         |
| N/A           | Near Die Repair and the Trash Compactor                          | None (material collected in shallow pit) |                                  | 4/9/2013               | Caustic Etch Solution (sodium hydroxide and sodium aluminate) |                               | 200 gallons, 741 lbs sodium hydroxide   |
| N/A           | Plant West Side of the Extrusion Department                      | None                                     |                                  | 6/24/2013              | 50% Caustic                                                   |                               | Unknown                                 |
| N/A           | Water Tank at Storm Water Ditch Behind Maintenance               | None                                     |                                  | 6/26/2013              | Water with Elevated pH                                        |                               | No Known Quantity                       |
| N/A           | Receiving Dock Shed                                              | None                                     |                                  | 7/30/2013              | Acetone                                                       |                               | 5-10 gallons                            |
| N/A           | Paintline Pretreatment Room                                      | None                                     |                                  | 8/10/2013              | Water with Sulfuric Acid                                      |                               | 50 gallons, < 1.0 lbs of sulfuric acid  |
| N/A           | Paintline Pretreatment Room                                      | None                                     |                                  | 8/12/2013              | Rinse Water with Sulfuric Acid                                |                               | 10 gallons, < 1.0 lbs of sulfuric acid  |
| N/A           | Storm Drain in Die Repair Area and Attached Storm Drainage Ditch | Soil, Surface Water                      |                                  | 11/15/2013             | 50% Sodium Hydroxide                                          |                               | 250 gallons                             |
| N/A           | Paintline Area                                                   | None                                     |                                  | Prior to 2014          | Paint                                                         |                               | No Known Quantity                       |
| N/A           | Die Repair Area                                                  | Soil                                     |                                  | Prior to 2014          | Caustic                                                       |                               | No Known Quantity                       |
| N/A           | Outside of Die Repair Area                                       | Soil                                     |                                  | Prior to 2014          | Sediment from Old Sanitary Sewer Line (VOCs, Metals, PCBs)    |                               | No Known Quantity                       |
| N/A           | Former Hydraulic Oil AST Area                                    | Soil                                     |                                  | Prior to 2014          | Hydraulic Oil                                                 |                               | No Known Quantity                       |
| N/A           | Storage Tank at Environmental                                    | Air                                      |                                  | 2/10/2014              | Ammonia vapor                                                 |                               | 42 lbs                                  |

Prepared by/Date: MPL/02-18-2024  
Checked by/Date: JMB/02-29-2024

**TABLE 4-4: SUMMARY OF RELEASES FROM JUNE 2014 TO FEBRUARY 2024**  
**Bonnell Aluminum, Inc., Newnan, Georgia**  
**PCC Permit Renewal Application, 2024**

|                                      |                                                                                                                          |
|--------------------------------------|--------------------------------------------------------------------------------------------------------------------------|
| <b>Incident date</b>                 | March 1, 2014                                                                                                            |
| <b>Incident description</b>          | Release of process water, calcium sulfate, aluminum hydroxide, sulfuric acid, and phosphoric acid                        |
| <b>Location</b>                      |                                                                                                                          |
| <b>Material discharged</b>           | Process Water, Calcium Sulfate, Aluminum hydroxide, 93% sulfuric acid, 17% sulfuric acid, 80% phosphoric acid            |
| <b>Volume discharged</b>             | 13,165 gallons (total process water); 38.59lbs 93% sulfuric acid, 211lbs 17% sulfuric acid, 44.87lbs 80% phosphoric acid |
| <b>pH</b>                            |                                                                                                                          |
| <b>Cause</b>                         | Sump pump failure                                                                                                        |
| <b>Discharge to surface water</b>    |                                                                                                                          |
| <b>Volume reaching surface water</b> |                                                                                                                          |
| <b>Incident reported</b>             | Oral reports to EPA and EPD                                                                                              |

  

|                                      |                              |
|--------------------------------------|------------------------------|
| <b>Incident date</b>                 | March 15, 2014               |
| <b>Incident description</b>          | Release of sodium hydroxide. |
| <b>Location</b>                      | Die Repair                   |
| <b>Material discharged</b>           | 25% Sodium Hydroxide         |
| <b>Volume discharged</b>             | <100 gallons                 |
| <b>pH</b>                            | 9.5                          |
| <b>Cause</b>                         | Control valve failure        |
| <b>Discharge to surface water</b>    | No                           |
| <b>Volume reaching surface water</b> | None                         |
| <b>Incident reported</b>             | EPD                          |

  

|                                      |                                                                  |
|--------------------------------------|------------------------------------------------------------------|
| <b>Incident date</b>                 | August 18, 2014                                                  |
| <b>Incident description</b>          | Release of untreated process waters                              |
| <b>Location</b>                      |                                                                  |
| <b>Material discharged</b>           | Diluted solution of sodium hydroxide                             |
| <b>Volume discharged</b>             | 400 gallons                                                      |
| <b>pH</b>                            | Between 9 and 10                                                 |
| <b>Cause</b>                         | Leak when transferring from temporary to permanent storage tank. |
| <b>Discharge to surface water</b>    | No                                                               |
| <b>Volume reaching surface water</b> | None                                                             |
| <b>Incident reported</b>             | Oral to EPA and EPD.                                             |

  

|                                      |                                    |
|--------------------------------------|------------------------------------|
| <b>Incident date</b>                 | February 15, 2015                  |
| <b>Incident description</b>          | Sludge from thickener tank release |
| <b>Location</b>                      | Environmental                      |
| <b>Material discharged</b>           | Lime                               |
| <b>Volume discharged</b>             | 400-500 gallons                    |
| <b>pH</b>                            | 7.5                                |
| <b>Cause</b>                         | Piping elbow came apart            |
| <b>Discharge to surface water</b>    | No                                 |
| <b>Volume reaching surface water</b> | n/a                                |
| <b>Incident reported</b>             | Yes                                |

  

|                                      |                                                                                                                                         |
|--------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------|
| <b>Incident date</b>                 | January 4, 2016                                                                                                                         |
| <b>Incident description</b>          | NAS Wastewater Spill from Broken Pipe                                                                                                   |
| <b>Location</b>                      | Pipe from Preneutralization Basin                                                                                                       |
| <b>Material discharged</b>           | NAS Wastewater - Caustic (7%), Water (93%)                                                                                              |
| <b>Volume discharged</b>             | Caustic (7%) - 7,953 gallons                                                                                                            |
| <b>pH</b>                            | 10.41 (collected at septic system prior to creek)                                                                                       |
| <b>Cause</b>                         | Pipe from Preneutralization Basin broke                                                                                                 |
| <b>Discharge to surface water</b>    | Weir in storm drain diverted flow to septic system which pumps back to WWT - no release occurred                                        |
| <b>Volume reaching surface water</b> | None                                                                                                                                    |
| <b>Incident reported</b>             | Oral Reports to NRC & EPD. Email to EPD - Angel White and Bryan Heard - documenting pH readings in creek that show no release occurred. |

**TABLE 4-4: SUMMARY OF RELEASES FROM JUNE 2014 TO FEBRUARY 2024**  
**Bonnell Aluminum, Inc., Newnan, Georgia**  
**PCC Permit Renewal Application, 2024**

|                                      |                                                                                                                                                                    |
|--------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Incident date</b>                 | April 19, 2016                                                                                                                                                     |
| <b>Incident description</b>          | Caustic Spill DRT                                                                                                                                                  |
| <b>Location</b>                      | Outside Die Repair                                                                                                                                                 |
| <b>Material discharged</b>           | 25-50% caustic solution (remaining volume is water)                                                                                                                |
| <b>Volume discharged</b>             | 300 gallons of 25-50% caustic solution                                                                                                                             |
| <b>pH</b>                            | Ranged from 8.51 to 11.14 from sample locations in area.                                                                                                           |
| <b>Cause</b>                         | A solenoid valve failed on the caustic system allowing the 1st and 2nd rinse tanks to overflow through vent pipes outside and onto the ground (soil and concrete). |
| <b>Discharge to surface water</b>    | No                                                                                                                                                                 |
| <b>Volume reaching surface water</b> | None - contained and prevented from reaching storm drains                                                                                                          |
| <b>Incident reported</b>             | Oral reports to NRC & EPD. Written report to EPA & EPD.                                                                                                            |

  

|                                      |                                                                      |
|--------------------------------------|----------------------------------------------------------------------|
| <b>Incident date</b>                 | June 29, 2016                                                        |
| <b>Incident description</b>          | Molten Aluminum Explosion                                            |
| <b>Location</b>                      | Cast House - Hot Top                                                 |
| <b>Material discharged</b>           | Debris - Aluminum and Concrete                                       |
| <b>Volume discharged</b>             | NA                                                                   |
| <b>pH</b>                            | NA                                                                   |
| <b>Cause</b>                         | Water came into contact with molten aluminum during casting of molds |
| <b>Discharge to surface water</b>    | NA                                                                   |
| <b>Volume reaching surface water</b> | NA                                                                   |
| <b>Incident reported</b>             | Oral reports to NRC and EPD.                                         |

  

|                                      |                                                                                                                                                                                                 |
|--------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Incident date</b>                 | May 8, 2017                                                                                                                                                                                     |
| <b>Incident description</b>          | Unknown black sludge that was dumped from a contractor's vacuum truck                                                                                                                           |
| <b>Location</b>                      | Hydrochloric Acid Containment area and drain to Preneutralization Basin in WWT along roadway                                                                                                    |
| <b>Material discharged</b>           |                                                                                                                                                                                                 |
| <b>Volume discharged</b>             | Unknown (sludge = 3 drums; 14,000 gallons impacted water in preneutralization basin)                                                                                                            |
| <b>pH</b>                            | 8                                                                                                                                                                                               |
| <b>Cause</b>                         | Contractor vacuum truck driver washed out truck in containment area                                                                                                                             |
| <b>Discharge to surface water</b>    | No                                                                                                                                                                                              |
| <b>Volume reaching surface water</b> | None                                                                                                                                                                                            |
| <b>Summary of Clean Up</b>           | No - spill was in containment and did not reach environment. Contractor was notified and removed the solids and affected process water, sampled for disposal profile and disposed of by others. |
| <b>Incident reported</b>             | Yes, reported in Semi-Annual Non-Compliance Report dated July 12, 2017                                                                                                                          |

  

|                                      |                                                                                                 |
|--------------------------------------|-------------------------------------------------------------------------------------------------|
| <b>Incident date</b>                 | May 24, 2017                                                                                    |
| <b>Incident description</b>          | Treated SAS waste water overflowed tank F1 into containment then overflowed outside containment |
| <b>Location</b>                      | SAS WWT building                                                                                |
| <b>Material discharged</b>           | Treated SAS wastewater from tank F1                                                             |
| <b>Volume discharged</b>             | Approximately 500 gallons                                                                       |
| <b>pH</b>                            | F1 tank set point pH 5.5 (5<pH<6)                                                               |
| <b>Cause</b>                         | pipe clogged between process tanks F1 and T1, overflowed F1                                     |
| <b>Discharge to surface water</b>    | No                                                                                              |
| <b>Volume reaching surface water</b> | None                                                                                            |
| <b>Incident reported</b>             | No -not reportable.                                                                             |



**TABLE 4-4: SUMMARY OF RELEASES FROM JUNE 2014 TO FEBRUARY 2024**  
**Bonnell Aluminum, Inc., Newnan, Georgia**  
**PCC Permit Renewal Application, 2024**

|                                      |                                                                                                                                                  |
|--------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Incident date</b>                 | October 12, 2017                                                                                                                                 |
| <b>Incident description</b>          | 25% Die Burn out Caustic was spilled from overturned tote during transfer. Reached storm water drain and was captured in stormwater containment. |
| <b>Location</b>                      | Bulk Caustic tank area                                                                                                                           |
| <b>Material discharged</b>           | 25% Die Burn out Caustic                                                                                                                         |
| <b>Volume discharged</b>             | 100-125 gallons                                                                                                                                  |
| <b>pH</b>                            | ~12                                                                                                                                              |
| <b>Cause</b>                         | Tote lid was not secured and tote fell off fork lift during transfer                                                                             |
| <b>Discharge to surface water</b>    | No - contained in stormwater containment/sump                                                                                                    |
| <b>Volume reaching surface water</b> | NA                                                                                                                                               |
| <b>Incident reported</b>             | Not Reported - below reportable amount                                                                                                           |

|                                      |                                                                                                                                                                                                                                  |
|--------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Incident date</b>                 | November 6, 2017                                                                                                                                                                                                                 |
| <b>Incident description</b>          | Leaking gasket flange observed by operator at 11:30 am, called in maintenance to repair. 11:45 am maintenance did not empty tank prior to replacing flange, acid shot out over containment area and flowed to storm drain vault. |
| <b>Location</b>                      | Nitric tank behind A-1 (anodizing line)                                                                                                                                                                                          |
| <b>Material discharged</b>           | 63% nitric acid                                                                                                                                                                                                                  |
| <b>Volume discharged</b>             | 30 gallons                                                                                                                                                                                                                       |
| <b>pH</b>                            | <2                                                                                                                                                                                                                               |
| <b>Cause</b>                         | worn out flange, and maintenance did not follow proper line breaking to release pressure or empty tank prevent spill                                                                                                             |
| <b>Discharge to surface water</b>    | No - reached stormwater containment sump & diverted to wastewater system                                                                                                                                                         |
| <b>Volume reaching surface water</b> | NA                                                                                                                                                                                                                               |
| <b>Incident reported</b>             | Oral reports to NRC and EPD.                                                                                                                                                                                                     |

|                                      |                                                                                                                              |
|--------------------------------------|------------------------------------------------------------------------------------------------------------------------------|
| <b>Incident date</b>                 | November 21, 2017                                                                                                            |
| <b>Incident description</b>          | pipe coupling broke at sump pit in wastewater treatment, non-hazardous process water spilled on surface and into storm drain |
| <b>Location</b>                      | wastewater treatment sump pit                                                                                                |
| <b>Material discharged</b>           | process water                                                                                                                |
| <b>Volume discharged</b>             | 5000 gallons                                                                                                                 |
| <b>pH</b>                            | 4.5-5.1                                                                                                                      |
| <b>Cause</b>                         | pipe broke at coupling                                                                                                       |
| <b>Discharge to surface water</b>    | yes - confirmed did not reach offsite                                                                                        |
| <b>Volume reaching surface water</b> | approx. 5,000 gallons                                                                                                        |
| <b>Incident reported</b>             | Not reportable                                                                                                               |

|                                      |                                                                                                                      |
|--------------------------------------|----------------------------------------------------------------------------------------------------------------------|
| <b>Incident date</b>                 | March 6, 2018                                                                                                        |
| <b>Incident description</b>          | Drum slipped out of drum clamp on forklift during loading for disposal, hit ground and dented lid, spilling contents |
| <b>Location</b>                      | Hazardous waste storage building                                                                                     |
| <b>Material discharged</b>           | D001 Hazardous Waste - Paintline Aromatic 100 solvent                                                                |
| <b>Volume discharged</b>             | 25 gallons                                                                                                           |
| <b>pH</b>                            |                                                                                                                      |
| <b>Cause</b>                         | Drum slipped out of clamp - raining weather conditions                                                               |
| <b>Discharge to surface water</b>    | no                                                                                                                   |
| <b>Volume reaching surface water</b> | na                                                                                                                   |
| <b>Incident reported</b>             | Oral and Written Reports submitted to EPA, DOT and EPD                                                               |

**TABLE 4-4: SUMMARY OF RELEASES FROM JUNE 2014 TO FEBRUARY 2024**  
**Bonnell Aluminum, Inc., Newnan, Georgia**  
**PCC Permit Renewal Application, 2024**

|                                      |                                                                                                              |
|--------------------------------------|--------------------------------------------------------------------------------------------------------------|
| <b>Incident date</b>                 | April 8, 2018                                                                                                |
| <b>Incident description</b>          | Caustic/rinse tank overflow through vent line to outside causing a wet area visual on the ground outside DRT |
| <b>Location</b>                      | Outside Die Repair & Tooling                                                                                 |
| <b>Material discharged</b>           | NaOH / Water (<25% solution); RQ 4,000 lbs (25% solution)                                                    |
| <b>Volume discharged</b>             | less than 200 gal (estimated at 75-100 gal)                                                                  |
| <b>pH</b>                            | >11                                                                                                          |
| <b>Cause</b>                         | Maintenance engaged a pump inside DRT and it caused the tank to overflow into the vent lines outside         |
| <b>Discharge to surface water</b>    | No                                                                                                           |
| <b>Volume reaching surface water</b> | NA                                                                                                           |
| <b>Incident reported</b>             | Not Reported                                                                                                 |

  

|                                      |                                                                                                        |
|--------------------------------------|--------------------------------------------------------------------------------------------------------|
| <b>Incident date</b>                 | June 25, 2018                                                                                          |
| <b>Incident description</b>          | Equipment failure at Casting cooling tower releasing reuse-water                                       |
| <b>Location</b>                      | Casting Cooling Tower                                                                                  |
| <b>Material discharged</b>           | Re-use water                                                                                           |
| <b>Volume discharged</b>             | Unknown                                                                                                |
| <b>pH</b>                            | Neutral (6-8)                                                                                          |
| <b>Cause</b>                         | Water from cooling tower overran secondary containment, Maintenance Ditch Containment Sump Pump Failed |
| <b>Discharge to surface water</b>    | Yes                                                                                                    |
| <b>Volume reaching surface water</b> | Unknown                                                                                                |
| <b>Incident reported</b>             | No                                                                                                     |

  

|                                      |                                                                                                                                                                            |
|--------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Incident date</b>                 | July 23, 2018                                                                                                                                                              |
| <b>Incident description</b>          | Visually observed water overflow from Brite Dip Scrubber Containment area to storm drain nearby, water from Casting cooling tower from overflow from casting pit clean out |
| <b>Location</b>                      | Brite Dip Scrubber Containment Area, Northside of Casting                                                                                                                  |
| <b>Material discharged</b>           | Re-use Water                                                                                                                                                               |
| <b>Volume discharged</b>             | Unknown                                                                                                                                                                    |
| <b>pH</b>                            | Neutral (6-8)                                                                                                                                                              |
| <b>Cause</b>                         | Equipment Failure                                                                                                                                                          |
| <b>Discharge to surface water</b>    | Yes                                                                                                                                                                        |
| <b>Volume reaching surface water</b> | Unknown                                                                                                                                                                    |
| <b>Incident reported</b>             | No                                                                                                                                                                         |

  

|                                      |                                                                                                    |
|--------------------------------------|----------------------------------------------------------------------------------------------------|
| <b>Incident date</b>                 | August 20, 2018                                                                                    |
| <b>Incident description</b>          | Hazardous Waste Drum slipped from clamp on forklift during transport to 90-day storage area        |
| <b>Location</b>                      | 90-day storage area                                                                                |
| <b>Material discharged</b>           | hazardous waste D001 - waste solvent (line flush & paint)                                          |
| <b>Volume discharged</b>             | 50 gallons                                                                                         |
| <b>pH</b>                            | NA                                                                                                 |
| <b>Cause</b>                         | clamp lost grip on drum and drum slipped from elevated height hitting ground and spilling contents |
| <b>Discharge to surface water</b>    | No                                                                                                 |
| <b>Volume reaching surface water</b> | NA                                                                                                 |
| <b>Incident reported</b>             | Yes - Written and Oral Reports to EPA & EPD                                                        |

**TABLE 4-4: SUMMARY OF RELEASES FROM JUNE 2014 TO FEBRUARY 2024**  
**Bonnell Aluminum, Inc., Newnan, Georgia**  
**PCC Permit Renewal Application, 2024**

|                                      |                                                                                                                                                                |
|--------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Incident date</b>                 | August 7, 2020                                                                                                                                                 |
| <b>Incident description</b>          | The DCU feed tank ruptured and was caught on the first round of fire watch on Friday 8/7/20 at 11:00 pm.                                                       |
| <b>Location</b>                      | Phosphoric Recovery, Buffing, and A-1 Basket crane que area. The solution was in 3 different containment areas and 2 concrete areas inside the plant building. |
| <b>Material discharged</b>           | 85% Water and 15% Phosphoric Acid                                                                                                                              |
| <b>Volume discharged</b>             | 18,372 pounds / 2000 gallons                                                                                                                                   |
| <b>pH</b>                            | Not Recorded - acidic                                                                                                                                          |
| <b>Cause</b>                         | A polyethylene tank was over 20 years old and deteriorated.                                                                                                    |
| <b>Discharge to surface water</b>    | No                                                                                                                                                             |
| <b>Volume reaching surface water</b> | NA                                                                                                                                                             |
| <b>Incident reported</b>             | No - contained inside building, no release to environment                                                                                                      |

|                                      |                                                                                                                                                                                                 |
|--------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Incident date</b>                 | September 8, 2020                                                                                                                                                                               |
| <b>Incident description</b>          | Employees were pumping out the casting pit to be able to get access to a float switch that failed and pumped to much water back into #6 cooling tower. Water overran Cooling Tower containment. |
| <b>Location</b>                      | Cooling Tower #6 / Casting concrete yard                                                                                                                                                        |
| <b>Material discharged</b>           | water with dilute cooling tower inhibitor                                                                                                                                                       |
| <b>Volume discharged</b>             | 2000 gallons                                                                                                                                                                                    |
| <b>pH</b>                            | neutral                                                                                                                                                                                         |
| <b>Cause</b>                         | Operator error / pumped more water into Cooling tower than it could hold                                                                                                                        |
| <b>Discharge to surface water</b>    | yes                                                                                                                                                                                             |
| <b>Volume reaching surface water</b> | 1250 gallons                                                                                                                                                                                    |
| <b>Incident reported</b>             | No                                                                                                                                                                                              |

|                                      |                                                                                                  |
|--------------------------------------|--------------------------------------------------------------------------------------------------|
| <b>Incident date</b>                 | February 5, 2022                                                                                 |
| <b>Incident description</b>          | Caustic released when hose disconnected from air diaphragm pump during unloading/loading process |
| <b>Location</b>                      | Bulk Caustic Tank Area                                                                           |
| <b>Material discharged</b>           | 25% Sodium hydroxide (spent die repair caustic)                                                  |
| <b>Volume discharged</b>             | 150 gallons                                                                                      |
| <b>pH</b>                            | >12                                                                                              |
| <b>Cause</b>                         | Equipment failure - hose disconnected from pump                                                  |
| <b>Discharge to surface water</b>    | No - stopped at containment at Maint. Ditch and was pumped to storage for WW treatment           |
| <b>Volume reaching surface water</b> | NA                                                                                               |
| <b>Incident reported</b>             | No (below RQ and did not reach surface water)                                                    |

|                                      |                                                                                                                                                                                                                                                                                                                          |
|--------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Incident date</b>                 | February 8, 2022                                                                                                                                                                                                                                                                                                         |
| <b>Incident description</b>          | Forklift driver was removing tote from trailer in loading area. One of the forks punctured the plastic tote and the driver immediately placed the forks down and a maintenance employee working the area grabbed some chemical gloves and turned the tote onto its side so that all of the contents would not spill out. |
| <b>Location</b>                      | Loading/Receiving Area                                                                                                                                                                                                                                                                                                   |
| <b>Material discharged</b>           | Cleaner - Sulfuric Acid                                                                                                                                                                                                                                                                                                  |
| <b>Volume discharged</b>             | 194 gallons                                                                                                                                                                                                                                                                                                              |
| <b>pH</b>                            | <2                                                                                                                                                                                                                                                                                                                       |
| <b>Cause</b>                         | Punctured tote with fork lift forks                                                                                                                                                                                                                                                                                      |
| <b>Discharge to surface water</b>    | No                                                                                                                                                                                                                                                                                                                       |
| <b>Volume reaching surface water</b> | NA                                                                                                                                                                                                                                                                                                                       |
| <b>Incident reported</b>             | No                                                                                                                                                                                                                                                                                                                       |

**TABLE 4-4: SUMMARY OF RELEASES FROM JUNE 2014 TO FEBRUARY 2024**  
**Bonnell Aluminum, Inc., Newnan, Georgia**  
**PCC Permit Renewal Application, 2024**

|                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|--------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Incident date</b>                 | August 24, 2022                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| <b>Incident description</b>          | The casting table was having mechanical issues, and hydraulic oil used in the process was not flowing as it normally does. Compressed air was put into a valve attached to the system at 80 psi and insufficient pressurization indicated the 2.5-inch pipe located under the concrete slab near the casting pit, was breached. Hydraulic oil was assumed to have leaked in the area outside of the pit area. The pipes are surrounded by sand and gravel not lined under the slab and sit outside of containment. |
| <b>Location</b>                      | Casting Pit Area                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| <b>Material discharged</b>           | Hydraulic Oil                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| <b>Volume discharged</b>             | 660 gallons                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| <b>pH</b>                            | NA                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| <b>Cause</b>                         | Breached pipe underground                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| <b>Discharge to surface water</b>    | NA                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| <b>Volume reaching surface water</b> | NA                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| <b>Incident reported</b>             | Yes - Oral and Written, & Follow-up Investigation Reports                                                                                                                                                                                                                                                                                                                                                                                                                                                          |

  

|                                      |                                                                                                                             |
|--------------------------------------|-----------------------------------------------------------------------------------------------------------------------------|
| <b>Incident date</b>                 | March 8, 2023                                                                                                               |
| <b>Incident description</b>          | Tote of Aromatic 100 solvent fell off the fork lift during transit. Tote had a faulty lid that came off when the tote fell. |
| <b>Location</b>                      | Outside of paintline                                                                                                        |
| <b>Material discharged</b>           | Aromatic 100 solvent (naptha solvent)                                                                                       |
| <b>Volume discharged</b>             | 125 gallons (estimated from contents remaining in tote)                                                                     |
| <b>pH</b>                            | NA                                                                                                                          |
| <b>Cause</b>                         | Tote fell off the fork lift and had a faulty lid                                                                            |
| <b>Discharge to surface water</b>    | NA                                                                                                                          |
| <b>Volume reaching surface water</b> | NA                                                                                                                          |
| <b>Incident reported</b>             | Yes - Oral & Written                                                                                                        |

  

|                                      |                                                                                                                                                                       |
|--------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Incident date</b>                 | June 28, 2023                                                                                                                                                         |
| <b>Incident description</b>          | The pump that was being used to pump the partially-treated wastewater from the thickener tank to the prenuite tank fell off the concrete pad at the filtration basin. |
| <b>Location</b>                      | waste water treatment thickner tank                                                                                                                                   |
| <b>Material discharged</b>           | Treated wastewater and wastewater sludge                                                                                                                              |
| <b>Volume discharged</b>             | approx. 1500 gallons                                                                                                                                                  |
| <b>pH</b>                            | pH readings indicated neutral pH (8.5 @ RO feed tank, 8.18 @ creek)                                                                                                   |
| <b>Cause</b>                         | equipment failure - Pump malfunction on thickener tank                                                                                                                |
| <b>Discharge to surface water</b>    | Yes - storm drains to outfall 008                                                                                                                                     |
| <b>Volume reaching surface water</b> | 225-300 gal                                                                                                                                                           |
| <b>Incident reported</b>             | Not reported                                                                                                                                                          |

Prepared by/Date: MPL/02-18-2024  
Checked by/Date: JMB/02-29-2024

TABLE 4-5: CAST HOUSE SOIL SAMPLE ANALYTICAL RESULTS  
Bonnell Aluminum, Inc., Newnan, Georgia  
PCC Permit Renewal Application, 2024

| CONSTITUENTS                 | WELL ID:<br>SAMPLE DATE:<br>DEPTH: | SB2        |            | SB3        |            | SB4        |            | SB5        |            |
|------------------------------|------------------------------------|------------|------------|------------|------------|------------|------------|------------|------------|
|                              |                                    | 12/28/2022 | 12/28/2022 | 12/28/2022 | 12/28/2022 | 12/28/2022 | 12/28/2022 | 12/28/2022 | 12/28/2022 |
| TPH DRO (mg/kg)              |                                    | 10'-12'    | 20'-22'    | 13'-15'    | 21'-23'    | 8'-10'     | 13'-15'    | 10'-12'    | 16'-18'    |
| PAHs (multiple constituents) |                                    | BDL        | BDL        | BDL        | BDL        | BDL        | BDL        | BDL        | BDL        |
| 1,4-Dioxane (ug/kg)          |                                    | BDL        | BDL        | BDL        | BDL        | BDL        | BDL        | BDL        | BDL        |
| Ethylene Chloride (ug/kg)    |                                    | NA         | NA         | NA         | NA         | NA         | NA         | NA         | NA         |
|                              |                                    | NA         | NA         | NA         | NA         | NA         | NA         | NA         | NA         |

| CONSTITUENTS                 | WELL ID:<br>SAMPLE DATE:<br>DEPTH: | SB8        |            | SB13       |            | SB14       |            |
|------------------------------|------------------------------------|------------|------------|------------|------------|------------|------------|
|                              |                                    | 12/29/2022 | 12/29/2022 | 12/29/2022 | 12/29/2022 | 12/29/2022 | 12/29/2022 |
| TPH DRO (mg/kg)              |                                    | 6'-8'      | 18'-20'    | 13'-15'    | 21'-23'    | 8'-10'     | 20'-25'    |
| PAHs (multiple constituents) |                                    | 687.0      | BDL        | BDL        | BDL        | BDL        | BDL        |
| 1,4-Dioxane (ug/kg)          |                                    | BDL        | BDL        | BDL        | BDL        | BDL        | BDL        |
| Ethylene Chloride (ug/kg)    |                                    | BDL        | NA         | NA         | NA         | NA         | NA         |
|                              |                                    | BDL        | NA         | NA         | NA         | NA         | NA         |

**Notes:**  
mg/kg - milligrams per kilogram  
ug/kg - micrograms per kilogram  
BDL = Below Detection Limit  
NA - Not Analyzed

Prepared by/Date: MPL/02-18-2024  
Checked by/Date: JMB/02-29-2024

**TABLE 4-6: SOLID WASTE MANAGEMENT UNITS WITH CORRECTIVE ACTIONS COMPLETED**  
**Bonnell Aluminum, Inc., Newnan, Georgia**  
**PCC Permit Renewal Application, 2024**

| SWMU # | SWMU DESCRIPTION                                     | REASON FOR CORRECTIVE ACTION                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | CORRECTIVE ACTION                                                               | CORRECTIVE ACTION DATE |
|--------|------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------|------------------------|
| 2      | Chromium Hydroxide Sand Drying Beds                  | RCRA Regulated Unit. Received clarified sludge (FO19) from aluminum chemical conversion coating wastewater treatment. Clarified wastewaters leached into the groundwater.                                                                                                                                                                                                                                                                                                                                                                                                                                                             | HWMU closed according to closure plan and included in Post Closure Care Permit. | NA                     |
| 3      | Chromium Hydroxide Landfill                          | RCRA Regulated Unit. Land disposal unit for F019 sludge from Chromium Hydroxide Sand Drying Beds.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | HWMU closed according to closure plan and included in Post Closure Care Permit. | NA                     |
| 4      | Surface Impoundment (Settling Pond & Polishing Pond) | RCRA Regulated Unit. Settling pond portion received non-clarified, pH adjusted, polymerized wastewater from anodizing wastewater treatment. Settling Pond acted as a clarifier. Claried wastewater from the treatment of aluminum chemical conversion coating wastewaters was discharged into the Settling Pond. Polishing pond portion on unit received supernate from settling pond. Clarified wastewaters from the chemical conversion coating wastewater treatment system was considered to contain some F019 sludge. Based on the Mixture Rule, the water and sludge in the Surface Impoundment was considered to be F019 waste. | HWMU closed according to closure plan and included in Post Closure Care Permit. | NA                     |
| 6      | Aluminum Hydroxide Land Treatment Unit               | RCRA Regulated Unit. Sludge considered to be F019 wastes was pumped from the Settling Pond to four sand drying beds. Sludge was land applied. All the sludge was considered to be F019 sludge based on the Mixture Rule.                                                                                                                                                                                                                                                                                                                                                                                                              | HWMU closed according to closure plan and included in Post Closure Care Permit. | NA                     |

**TABLE 4-6: SOLID WASTE MANAGEMENT UNITS WITH CORRECTIVE ACTIONS COMPLETED**  
**Bonnell Aluminum, Inc., Newnan, Georgia**  
**PCC Permit Renewal Application, 2024**

| SWMU # | SWMU DESCRIPTION                                                           | REASON FOR CORRECTIVE ACTION                                                                                                 | CORRECTIVE ACTION                                                                                      | CORRECTIVE ACTION DATE |
|--------|----------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------|------------------------|
| 7/46   | Tank Farm Unit                                                             | Accumulation Tank for Waste Solvent (SWMU 7)                                                                                 | HWMU closed according to closure plan. SWMU 7 and 46 combined to make HWMU Tank Farm Unit.             | 1996-present           |
|        |                                                                            | Solvent Tank Farm (SWMU 46)                                                                                                  | On-going air injection system.                                                                         | 1997-present           |
| 11     | Anodizing Wastewater Treatment System and Piping Upstream of Settling Pond | Underground drain line leaked caustic near process water recycling system equalization basin.                                | In situ neutralization and soil removal                                                                | Sept 2012              |
|        |                                                                            | More contaminated soil was discovered under concrete near equalization basin and was remediated.                             | In situ neutralization and soil removal                                                                | January 2013           |
|        |                                                                            | Spills and leaks over many years had impacted the soils under the tanks in this storage area.                                | Tanks, foundations, and concrete were removed and soils with high and low pH were neutralized in situ. | June-July 2013         |
| 13     | Truck Shop Pipe Discharge                                                  | Oily discharge from Truck Shop oil/water separator contaminated soil.                                                        | Contaminated soil was removed and disposed of in Bon L's CAMU (Surface Impoundment Closure Area)       | July-August, 1995      |
| 14     | Truck Shop Parking Area                                                    | Oily water from an oil/water separator for dust control in the Truck Shop parking area. Soils in the area were contaminated. | Contaminated soil was removed and disposed of in Bon L's CAMU (Surface Impoundment Closure Area)       | July-August, 1995      |

**TABLE 4-6: SOLID WASTE MANAGEMENT UNITS WITH CORRECTIVE ACTIONS COMPLETED**  
**Bonnell Aluminum, Inc., Newnan, Georgia**  
**PCC Permit Renewal Application, 2024**

| SWMU # | SWMU DESCRIPTION                                                                              | REASON FOR CORRECTIVE ACTION                                                                                                                                                                        | CORRECTIVE ACTION                                                                                              | CORRECTIVE ACTION DATE   |
|--------|-----------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------|--------------------------|
| 16     | Truck Shop Parking Area                                                                       | Diesel and motor oil spilled on the ground.                                                                                                                                                         | Removed water and contaminated soil.                                                                           | February 2006            |
|        |                                                                                               | While removing concrete during a general cleanup of the area behind the maintenance building, a contractor found a drum of paint booth drippings.                                                   | Excavated the drum along with small amount of contaminated soil. Drum and soils were disposed of as D001 waste | May 2009                 |
|        |                                                                                               | General use for metal parts storage with a 20 ft X 50 ft storage area for empty drums. Contaminated soils were discovered during the RCRA Facility Investigation.                                   | Contaminated soil was removed and disposed of in Bon L's CAMU (Surface Impoundment Closure Area)               | July-August, 1995        |
|        |                                                                                               | While removing concrete during a general cleanup of the area behind the maintenance building, a contractor found a drum of paint booth drippings.                                                   | Excavated along with small amount of contaminated soil and disposed as D001 waste                              | May 2012                 |
| 17     | Drum Crusher Area                                                                             | Contaminated soils were discovered during the RCRA Facility Investigation.                                                                                                                          | Contaminated soil was removed and disposed of in Bon L's CAMU (Surface Impoundment Closure Area)               | July-August, 1995        |
| 18     | Storm Sewer System That Conducted Hydraulic Oils, Acids, Caustics, Solvents Including Ditches | Spills of caustic occurred on August 25 and August 30 to the stormwater ditch leading to un-named tributary of Mineral Springs Branch.                                                              | Removed contamination and neutralized some water in situ                                                       | August - September, 2006 |
|        |                                                                                               | A hydraulic oil spill was discovered on a road. Cleanup was interrupted by a storm event placing small amount of oil in a stormwater ditch leading to un-named tributary of Mineral Springs Branch. | Absorbents used and contaminated water were removed.                                                           | October 2008             |
|        |                                                                                               | A fuel tank leak on a supplier's truck spilled diesel fuel into the scales pit. Some of the diesel fuel leaked into the stormwater ditch leading to un-named tributary of Mineral Springs Branch.   | Responsible party (supplier) remediated spill to pit at the scales.                                            | November 2009            |



**TABLE 4-6: SOLID WASTE MANAGEMENT UNITS WITH CORRECTIVE ACTIONS COMPLETED**  
**Bonnell Aluminum, Inc., Newnan, Georgia**  
**PCC Permit Renewal Application, 2024**

| SWMU # | SWMU DESCRIPTION              | REASON FOR CORRECTIVE ACTION                                                                                                                                                                                                                                                | CORRECTIVE ACTION                                                                                | CORRECTIVE ACTION DATE |
|--------|-------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------|------------------------|
|        |                               | A contractor was transferring waste to a vacuum truck and a plugged valve caused a surge of ammonium bifluoride and caustic liquid to spill onto soil near a drain. The spill may have reached the stormwater ditch leading to unnamed tributary of Mineral Springs Branch. | Liquid spilled was removed by the contractor that caused the spill.                              | June 2011              |
|        |                               | Piping and the open creek/ditch received oil leaks from hydraulic presses, storm water, and process wastewater containing acids, caustics, and solvents.                                                                                                                    | Contaminated soil was removed and disposed of in Bon L's CAMU (Surface Impoundment Closure Area) | July-August, 1995      |
| 19     | Area West of Die Shop         | Open ground area that received discarded metal filings, petroleum coolant, and graphite.                                                                                                                                                                                    | Contaminated soil was removed and disposed of in Bon L's CAMU (Surface Impoundment Closure Area) | July-August, 1995      |
| 23     | Inactive Oil/Water Separator  | An inactive oil/water separator was positioned to intercept creekwater that carried hydraulic oil, storm water, and process wastewaters discussed with SWMU No. 18.                                                                                                         | Contaminated soil was removed and disposed of in Bon L's CAMU (Surface Impoundment Closure Area) | July-August, 1995      |
| 29     | Steam Cleaner Area            | Machinery and mobile equipment are cleaned on a concrete apron. Runoff to the Settling Pond occurred until new treatment system was installed in fall of 1991.                                                                                                              | Contaminated soil was removed and disposed of in Bon L's CAMU (Surface Impoundment Closure Area) | July-August, 1995      |
| 35     | Sink Frame Building Area      | Building and area that contained the initial aluminum extrusion business, including paint and fabrication processes. Contaminated soils were discovered during the RCRA Facility Investigation.                                                                             | Contaminated soil was removed and disposed of in Bon L's CAMU (Surface Impoundment Closure Area) | July-August, 1995      |
| 42     | Cooling Tower Areas (6 areas) | Areas received spills from cooling towers. Contaminated soils were discovered during the RCRA Facility Investigation.                                                                                                                                                       | Areas of concern have been capped with concrete. Metals contamination is not mobile in soil.     | 1995 and earlier       |

**TABLE 4-6: SOLID WASTE MANAGEMENT UNITS WITH CORRECTIVE ACTIONS COMPLETED**  
**Bonnell Aluminum, Inc., Newnan, Georgia**  
**PCC Permit Renewal Application, 2024**

| SWMU # | SWMU DESCRIPTION                | REASON FOR CORRECTIVE ACTION                                                                                                                                       | CORRECTIVE ACTION                                                                                | CORRECTIVE ACTION DATE |
|--------|---------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------|------------------------|
| 7/46   | Tank Farm Unit                  | Accumulation Tank for Waste Solvent (SWMU 7)                                                                                                                       | HWMU closed according to closure plan. SWMU 7 and 46 combined to make HWMU Tank Farm Unit.       | 1996-present           |
|        |                                 | Solvent Tank Farm (SWMU 46)                                                                                                                                        | On-going air injection system.                                                                   | 1997-present           |
| 50     | F019 Spill area                 | F019 sludge was discovered in the Calcium Aluminate Landfill area.                                                                                                 | Contaminated soil was removed and disposed of in Bon L's CAMU (Surface Impoundment Closure Area) | July-August, 1995      |
| 53     | Furnace Foundation in Casting   | An old reverbratory furnace bottom was discovered in the cast house near the current furnaces when heaving concrete was noticed just south of the holding furnace. | All burried materials were removed, tested and disposed as nonhazardous wastes                   | December 2008          |
| 54     | Hydraulic Oil Storage Tank Area | Area contained storage tanks for hydraulic oil. Soil had been contaminated with oil that contained PCBs.                                                           | Excavated soil to risk-level PCB concentrations                                                  | June-July 2013         |
| 55     | Die Repair Process              | Soil under Die Repair Process is contaminated with caustic. Soils had high pH values.                                                                              | Remediation soil removal and disposal.                                                           | Sept. 2013             |

Prepared by/Date: MPL/02-18-2024  
Checked by/Date: JMB/02-29-2024

**TABLE 4-7: SOLID WASTE MANAGEMENT UNITS REQUIRING NO FURTHER ACTIONS**  
**Bonnell Aluminum, Inc., Newnan, Georgia**  
**PCC Permit Renewal Application, 2024**

| <b>SWMU #</b> | <b>SWMU DESCRIPTION</b>                                                                     |
|---------------|---------------------------------------------------------------------------------------------|
| 1             | Calcium Aluminate Landfill                                                                  |
| 8             | Temporary F019 Drum and Roll-Off Container Storage Area                                     |
| 9             | Roll-Off Container Storage Area, CrOH Sludge Tank and CrOH Filter Press                     |
| 10            | Paintline Wastewater Treatment System and all piping                                        |
| 12            | Truck Shop Sump plus Piping and Trench                                                      |
| 15            | Area Under Truck Shop Oil/Water Separator                                                   |
| 20            | Discharge Areas from Fabrication Building                                                   |
| 21            | Former Oil/Water Separator Near Fabrication Building                                        |
| 22            | Active Oil/Water Separator                                                                  |
| 24            | Reported Trash Dump(shown on 1966 topo)                                                     |
| 25            | Reported Trash Dump Near Chromium Hydroxide Landfill                                        |
| 26            | Demolition/Construction Debris Disposal Area                                                |
| 27            | Acid Spill Area Near Phosphoric Acid Storage                                                |
| 28            | Scrubbers Serving Fabrication Building                                                      |
| 30            | Battery Recharge Stations                                                                   |
| 31            | Paintline Spill Area                                                                        |
| 32            | Old Melter Burial Areas (3 areas) - Casting Offices, West of Settling Pond, Near Truck Shop |
| 33            | Fork Lift Shop Oil Sump                                                                     |
| 34            | Exterior Trash Containers (3)                                                               |
| 36            | Sump Below Paint Booths                                                                     |
| 37            | Fabrication Building Cooling Tower Discharge Ditch                                          |
| 38            | Discharge Areas from Sinks Not Connected to Sanitary or Process Sewers                      |
| 39            | Former Employee Parking Lot                                                                 |
| 40            | Buffing Dust Area in Fabrication Building                                                   |
| 41            | Paint Hook Burn-Off Oven                                                                    |
| 43            | Former Die Shop Waste Oil/Solvent Area                                                      |
| 44            | Chromium Hydroxide Sand Drying Beds Closure Stockpile Area                                  |
| 45            | Container Cleaner Unit                                                                      |
| 47            | Underground Storage Tank                                                                    |
| 48            | Paintline Pit                                                                               |
| 51            | Oil Changing Area                                                                           |
| 52            | Pipe Disposal Area                                                                          |

Prepared by/Date: MPL/02-18-2024  
Checked by/Date: JMB/02-29-2024

**TABLE 4-8: SOLID WASTE MANAGEMENT UNITS WITH ON-GOING CORRECTIVE ACTIONS**  
**Bonnell Aluminum, Inc., Newnan, Georgia**  
**PCC Permit Renewal Application, 2024**

| <b>SWMU #</b> | <b>SWMU DESCRIPTION</b> | <b>Reason for Corrective Action if Needed</b> | <b>Corrective Action</b>                                                                                                                                  | <b>Corrective Action Date</b> | <b>FUNCTION/DESCRIPTION</b>                                                                                                               |
|---------------|-------------------------|-----------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------|
| 49            | PCE Degreasing Unit     | PCE Degreasing Unit                           | Soil vapor extraction system operated between 1995 and 2004.<br><br>On-going groundwater remediation using pump and treat and in-situ chemical oxidation. | 1994 to present               | Tank vaporized PCE to degrease extrusions. Sludge containing PCE was probably discharged to soil and/or the storm sewer system (SWMU 18). |

Prepared by/Date: MPL/02-18-2024  
Checked by/Date: JMB/02-29-2024

**TABLE 5-1: INSPECTION SCHEDULE**  
**Bonnell Aluminum, Inc., Newnan, Georgia**  
**PCC Permit Renewal Application, 2024**

| INSPECTION ITEM                        | INSPECTION DESCRIPTION                                                                                                                                                                                                                                                                                                                                                                                            | INSPECTION FREQUENCY                                                                                                           |
|----------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------|
| Aluminum Hydroxide Land Treatment Unit | <ol style="list-style-type: none"> <li>1. Visually inspect for vegetative distress, insect infestation, woody plant infiltration, erosion, or bare vegetative areas.</li> <li>2. Visually inspect the Surface Water Monitoring Stations for structural integrity and for the presence and legibility of identification.</li> <li>3. Note the reason for inspection: routine or post-rainfall.</li> </ol>          | <ol style="list-style-type: none"> <li>1. Quarterly</li> <li>2. Following heavy rainfall events or natural disaster</li> </ol> |
| Hazardous Waste Management Area        | <ol style="list-style-type: none"> <li>1. Visually inspect for vegetative distress, insect infestation, woody plant infiltration, erosion, or bare vegetative areas.</li> <li>2. Visually inspect drainage features for structural integrity and the presence of erosion.</li> <li>3. Note the reason for inspection: routine or post-rainfall.</li> </ol>                                                        | <ol style="list-style-type: none"> <li>1. Quarterly</li> <li>2. Following heavy rainfall events or natural disaster</li> </ol> |
| Chromium Hydroxide Landfill            | <ol style="list-style-type: none"> <li>1. Visually inspect for vegetative distress, insect infestation, woody plant infiltration, erosion, or bare vegetative areas.</li> <li>2. Visually inspect drainage features for structural integrity and the presence of erosion.</li> <li>3. Note the reason for inspection: routine or post-rainfall.</li> </ol>                                                        | <ol style="list-style-type: none"> <li>1. Quarterly</li> <li>2. Following heavy rainfall events or natural disaster</li> </ol> |
| Tank Farm Unit                         | <ol style="list-style-type: none"> <li>1. Visually inspect for cracks or breaks in the concrete cover.</li> <li>2. Note the reason for inspection: routine or post-rainfall.</li> </ol>                                                                                                                                                                                                                           | <ol style="list-style-type: none"> <li>1. Quarterly</li> <li>2. Following heavy rainfall events or natural disaster</li> </ol> |
| Property Fence and Signage Inspection  | <ol style="list-style-type: none"> <li>1. Visually inspect the fence for any breaks, collapses, erosion, excessive rust, or any other damage.</li> <li>2. Visually inspect the signage for its presence and legibility.</li> </ol>                                                                                                                                                                                | <ol style="list-style-type: none"> <li>1. Quarterly</li> <li>2. Following natural disaster</li> </ol>                          |
| Monitoring Well Inspection             | <ol style="list-style-type: none"> <li>1. Visually inspect for damage or deterioration to the well pad, well vault, well lock, well cap including insect infiltration at the edges of the well pad.</li> <li>2. Visually inspect for the presence and legibility of the well label, the presence of pooled water inside the well vault, and the presence of measuring point on top of the well casing.</li> </ol> | <ol style="list-style-type: none"> <li>1. Quarterly</li> <li>2. Following natural disaster</li> </ol>                          |

Note:

1) Heavy rainfall event is defined as 3.0 inches or more in a single day.

Prepared by/Date: MPL/02-18-2024

Checked by/Date: JMB/02-29-2024

**TABLE 6-1: WATER SUPPLY WELLS SURVEY INFORMATION**  
**Bonnell Aluminum, Inc., Newnan, Georgia**  
**PCC Permit Renewal Application, 2024**

| WELL NO. | OWNER                                                                          | LATTITUDE  | LONGITUDE  | DEPTH (FT) | CASING DEPTH (FT) | YEAR DRILLED | ELEVATION (FT) |
|----------|--------------------------------------------------------------------------------|------------|------------|------------|-------------------|--------------|----------------|
| 1        | J.W. Hughie<br>11 Beech St.<br>Newnan                                          | 33 23' 19" | 84 49' 41" | 320        | 70                | 1977         | 890            |
| 2        | Fred L. Schronder<br>16 Beech St.<br>Newnan                                    | 33 23' 17" | 84 49' 45" | 255        | 65                | 1974         | 940            |
| 3        | Garnett H. Shirley<br>132 Temple Ave.<br>Newnan                                | 33 23' 17" | 84 49' 46" | 230        | 71                | 1972         | 920            |
| 4        | Dixie Hill Enterprises<br>McDowell Brothers<br>Wedgewood Subdivision<br>Newnan | 33 23' 16" | 84 49' 58" | unknown    | unknown           | 1977         | 960            |
| 5        | Dixie Hill Enterprises<br>McDowell Brothers<br>Wedgewood Subdivision<br>Newnan | 33 23' 17" | 84 50' 10" | 187        | 31                | 1977         | 840            |
| 6        | Westside School<br>Newnan                                                      | 33 22' 27" | 84 49' 48" | 302        | 113               | 1954         | 860            |
| 7        | Roy E. Knox<br>Belt Rd.<br>Newnan                                              | 33 22' 12" | 84 49' 37" | 136        | 19                | 1958         | 880            |

Prepared by/Date: TRK/02-22-2024  
Checked by/Date: MPL/02-28-2024

TABLE 6-2: WELL CONSTRUCTION AND SURVEY INFORMATION  
Bonnell Aluminum, Inc., Newnan, Georgia  
PCC Permit Renewal Application, 2024

| WELL ID | WELL TYPE | DATE INSTALLED | DRILLER  | ELEVATION PVC CASING (ft NGVD) | PAD ELEVATION (ft NGVD) | ELEVATION WELL BOTTOM (ft NGVD) | TOTAL WELL DEPTH (ft bgs) | AUGER REFUSAL | AUGER DIAMETER (in) | DEPTH TO SCREEN (ft) | SCREEN LENGTH (ft) | SLOT SIZE (in) | DEPTH TO SAND (ft) | DEPTH TO BENTONITE (ft) | GEOLOGIC UNIT MONITORED | WELL COORDINATES NORTHING EASTING (State Plane, ft) |
|---------|-----------|----------------|----------|--------------------------------|-------------------------|---------------------------------|---------------------------|---------------|---------------------|----------------------|--------------------|----------------|--------------------|-------------------------|-------------------------|-----------------------------------------------------|
| MW2SR   | TYPE II   | 9/20/1990      | LAYNE    | 918.60                         | 917.90                  | 905.10                          | 13.5                      | NO            | 8                   | 2.5                  | 10                 | 1.0            | 1.0                | 0.9                     | SAPROLITE               | 1230454.0 301086.6                                  |
| MW2DR   | TYPE II   | 9/20/1990      | LAYNE    | 918.40                         | 918.00                  | 878.90                          | 39.5                      | YES           | 8                   | 29.5                 | 10                 | 0.01           | 19.0               | 16.0                    | SAPROLITE               | 1230451.6 301079.0                                  |
| MW4SR   | TYPE II   | 9/21/1990      | LAYNE    | 909.80                         | 907.80                  | 880.00                          | 28.0                      | NO            | 8                   | 18.0                 | 10                 | 0.01           | 16.0               | 10.0                    | SAPROLITE               | 1229378.7 300519.6                                  |
| MW7D    | TYPE II   | 9/22/1989      | ATEC     | 903.30                         | 900.70                  | 855.80                          | 47.5                      | YES           | 8                   | 37.0                 | 10                 | 0.01           | 34.0               | 30.0                    | SAPROLITE               | 1230256.8 300293.5                                  |
| MW13S   | TYPE II   | 11/29/1989     | ATEC     | 952.50                         | 950.40                  | 927.50                          | 25.0                      | NO            | 9                   | 15.0                 | 10                 | 0.01           | 13.0               | 10.5                    | SAPROLITE               | 1231252.6 300275.1                                  |
| MW17D   | TYPE II   | 4/27/1990      | LAYNE    | 912.60                         | 911.10                  | 878.20                          | 34.4                      | YES           | 8                   | 34.4                 | 10                 | 0.01           | 22.0               | 20.0                    | SAPROLITE               | 1229374.1 300619.6                                  |
| MW18S   | TYPE II   | 5/1/1990       | LAYNE    | 903.80                         | 901.70                  | 883.00                          | 20.8                      | NO            | 8                   | 10.3                 | 10                 | 0.01           | 8.3                | 6.3                     | SAPROLITE               | 1229517.9 300563.4                                  |
| MW18D   | TYPE II   | 5/1/1990       | LAYNE    | 903.90                         | 901.80                  | 869.30                          | 34.6                      | YES           | 8                   | 24.1                 | 10                 | 0.01           | 22.1               | 20.1                    | SAPROLITE               | 1229522.4 300563.3                                  |
| MW19S   | TYPE II   | 4/26/1990      | LAYNE    | 906.90                         | 907.00                  | 875.70                          | 31.2                      | NO            | 8                   | 20.8                 | 10                 | 0.01           | 18.8               | 16.8                    | SAPROLITE               | 1229447.1 300351.6                                  |
| MW19D   | TYPE II   | 4/20/1990      | LAYNE    | 907.00                         | 907.10                  | 863.80                          | 43.2                      | YES           | 8                   | 32.8                 | 10                 | 0.01           | 30.8               | 28.8                    | SAPROLITE               | 1229444.9 300355.3                                  |
| MW20S   | TYPE II   | 4/30/1990      | LAYNE    | 880.30                         | 880.40                  | 864.80                          | 15.5                      | NO            | 8                   | 5.1                  | 10                 | 0.01           | 3.1                | 1.1                     | SAPROLITE               | 1229403.2 300053.8                                  |
| MW20D   | TYPE II   | 4/30/1990      | LAYNE    | 880.00                         | 880.30                  | 839.90                          | 40.1                      | YES           | 8                   | 29.6                 | 10                 | 0.01           | 27.6               | 25.6                    | SAPROLITE               | 1229603.7 300048.9                                  |
| MW21D   | TYPE II   | 5/3/1990       | LAYNE    | 871.90                         | 871.90                  | 831.30                          | 40.6                      | YES           | 8                   | 30.2                 | 10                 | 0.01           | 28.2               | 26.2                    | SAPROLITE               | 1229726.1 300984.9                                  |
| MW24D   | TYPE II   | 5/3/1990       | LAYNE    | 926.20                         | 926.20                  | 887.70                          | 38.5                      | YES           | 8                   | 28.0                 | 10                 | 0.01           | 26.0               | 24.0                    | SAPROLITE               | 1229399.6 300956.0                                  |
| MW26S   | TYPE II   | 5/21/1990      | LAYNE    | 935.50                         | 935.90                  | 913.60                          | 21.9                      | NO            | 8                   | 11.5                 | 10                 | 0.01           | 9.5                | 7.5                     | SAPROLITE               | 1230306.8 301422.0                                  |
| MW26D   | TYPE II   | 5/21/1990      | LAYNE    | 935.50                         | 935.90                  | 889.90                          | 45.6                      | YES           | 8                   | 35.1                 | 10                 | 0.01           | 33.1               | 31.1                    | SAPROLITE               | 1230308.6 301420.3                                  |
| MW27S   | TYPE II   | 5/22/1990      | LAYNE    | 914.20                         | 911.50                  | 902.50                          | 11.7                      | NO            | 8                   | 1.3                  | 10                 | 0.01           | 0.3                | 0.1                     | SAPROLITE               | 1230295.7 301218.2                                  |
| MW27D   | TYPE II   | 5/22/1990      | LAYNE    | 912.30                         | 911.50                  | 883.00                          | 29.3                      | YES           | 8                   | 18.8                 | 10                 | 0.01           | 16.8               | 14.8                    | SAPROLITE               | 1230298.8 301222.0                                  |
| MW28S   | TYPE II   | 5/23/1990      | LAYNE    | 909.60                         | 908.20                  | 896.90                          | 12.7                      | NO            | 8                   | 2.3                  | 10                 | 0.01           | 0.3                | 0.0                     | SAPROLITE               | 1230041.7 301034.9                                  |
| MW28D   | TYPE II   | 5/23/1990      | LAYNE    | 909.80                         | 908.20                  | 881.00                          | 28.8                      | YES           | 8                   | 18.4                 | 10                 | 0.01           | 16.4               | 14.4                    | SAPROLITE               | 1230040.8 301039.3                                  |
| MW31D   | TYPE II   | 7/10/1990      | LAYNE    | 928.80                         | 925.80                  | 891.80                          | 37.0                      | YES           | 8                   | 27.0                 | 10                 | 0.01           | 25.0               | 22.5                    | SAPROLITE               | 1229633.6 300729.8                                  |
| MW32S   | TYPE II   | 7/10/1990      | LAYNE    | 922.70                         | 920.80                  | 887.70                          | 35.0                      | NO            | 8                   | 25.0                 | 10                 | 0.01           | 23.0               | 20.5                    | SAPROLITE               | 1229782.9 300704.5                                  |
| MW32D   | TYPE II   | 7/10/1990      | LAYNE    | 922.60                         | 920.90                  | 877.60                          | 45.0                      | YES           | 8                   | 35.0                 | 10                 | 0.01           | 33.0               | 30.5                    | SAPROLITE               | 1229786.5 300704.9                                  |
| MW35D   | TYPE II   | 7/16/1990      | LAYNE    | 922.30                         | 920.40                  | 898.30                          | 24.0                      | YES           | 8                   | 14.0                 | 10                 | 0.01           | 11.5               | 9.5                     | SAPROLITE               | 1229892.3 300933.7                                  |
| MW36S   | TYPE II   | 8/7/1990       | LAYNE    | 940.90                         | 940.90                  | 915.90                          | 25.0                      | NO            | 8                   | 15.0                 | 10                 | 0.01           | 13.0               | 10.0                    | SAPROLITE               | 1231001.7 301953.5                                  |
| MW36D   | TYPE II   | 8/7/1990       | LAYNE    | 941.00                         | 941.00                  | 900.60                          | 40.4                      | YES           | 8                   | 35.0                 | 5                  | 0.01           | 33.0               | 30.5                    | SAPROLITE               | 1230997.7 301957.4                                  |
| MW37D   | TYPE II   | 8/8/1990       | LAYNE    | 932.40                         | 932.50                  | 869.40                          | 63.0                      | YES           | 8                   | 53.0                 | 10                 | 0.01           | 51.0               | 48.0                    | SAPROLITE               | 1230125.4 301763.9                                  |
| MW39D   | TYPE II   | 8/13/1990      | LAYNE    | 927.90                         | 928.00                  | 892.70                          | 35.2                      | YES           | 8                   | 25.0                 | 10                 | 0.01           | 23.0               | 20.0                    | SAPROLITE               | 1229905.2 301235.6                                  |
| MW40D   | TYPE II   | 8/17/1990      | SUNRISE  | 938.70                         | 938.90                  | 912.70                          | 26.0                      | YES           | 8                   | 16.0                 | 10                 | 0.01           | 14.0               | 11.0                    | SAPROLITE               | 1230812.2 301765.7                                  |
| MW42S   | TYPE II   | 11/7/1990      | LAYNE    | 891.70                         | 889.10                  | 866.20                          | 25.5                      | NO            | 8                   | 15.5                 | 10                 | 0.01           | 12.0               | 9.4                     | SAPROLITE               | 1229998.9 300027.0                                  |
| MW43S   | TYPE II   | 5/30/1990      | LAYNE    | 881.60                         | 879.00                  | 859.60                          | 22.0                      | NO            | 10                  | 6.8                  | 10                 | 0.01           | 2.5                | 0.0                     | SAPROLITE               | 1230160.0 300050.0                                  |
| MW44S   | TYPE II   | 5/31/1990      | LAYNE    | 890.70                         | 888.20                  | 871.70                          | 19.0                      | NO            | 10                  | 7.2                  | 10                 | 0.01           | 2.1                | 0.0                     | SAPROLITE               | 1230492.7 300105.4                                  |
| MW44D   | TYPE II   | 5/31/1990      | LAYNE    | 888.10                         | 888.10                  | 851.30                          | 39.5                      | YES           | 10                  | 29.5                 | 10                 | 0.01           | 27.0               | 25.0                    | SAPROLITE               | 1230483.8 300105.1                                  |
| MW45S   | TYPE II   | 5/14/1992      | LAYNE    | 898.00                         | 895.40                  | 881.68                          | 16.3                      | NO            | 8                   | 4.0                  | 10                 | 0.01           | 3.0                | 1.5                     | SAPROLITE               | 1230665.6 300199.8                                  |
| MW48S   | TYPE II   | 12/7/1995      | KILMAN   | 898.40                         | 896.30                  | 877.40                          | 21.0                      | NO            | 8                   | 5.0                  | 15                 | 0.02           | 4.0                | 2.0                     | SAPROLITE               | 1230242.3 300747.8                                  |
| MW49S   | TYPE II   | 12/7/1995      | KILMAN   | 901.20                         | 898.70                  | 887.20                          | 14.0                      | YES           | 8                   | 4.0                  | 10                 | 0.02           | 3.5                | 2.0                     | SAPROLITE               | 1230178.8 300781.2                                  |
| MW50S   | TYPE II   | 12/7/1995      | KILMAN   | 898.50                         | 895.70                  | 883.50                          | 15.0                      | YES           | 8                   | 5.0                  | 10                 | 0.02           | 4.5                | 2.0                     | SAPROLITE               | 1230085.6 300817.6                                  |
| MW51S   | TYPE II   | 10/23/1997     | ENV. EX. | 929.10                         | 927.40                  | 907.97                          | 21.1                      | YES           | 6                   | 8.5                  | 10                 | 0.01           | 6.5                | 4.5                     | SAPROLITE               | 1230289.1 301318.7                                  |
| MW52S   | TYPE II   | 1/13/1997      | ENV. EX. | 929.90                         | 927.40                  | 910.40                          | 19.5                      | YES           | 6                   | 6.5                  | 10                 | 0.01           | 5.0                | 3.5                     | SAPROLITE               | 1230256.7 301328.5                                  |
| MW53S   | TYPE II   | 11/24/1997     | ENV. EX. | 904.20                         | 901.40                  | 883.45                          | 20.8                      | NO            | 8                   | 8.0                  | 10                 | 0.01           | 6.0                | 4.0                     | SAPROLITE               | 1229746.5 300348.6                                  |
| MW54S   | TYPE II   | 11/25/1997     | ENV. EX. | 895.90                         | 893.10                  | 878.03                          | 17.9                      | NO            | 8                   | 5.0                  | 10                 | 0.01           | 3.0                | 1.0                     | SAPROLITE               | 1230028.0 300287.0                                  |
| MW73S   | TYPE II   | 10/12/2006     | PDMMT    | 938.30                         | 938.50                  | 909.37                          | 28.9                      | NO            | 8                   | 18.0                 | 10                 | 0.01           | 16.0               | 14.0                    | SAPROLITE               | 1230625.6 301622.5                                  |
| MW75S   | TYPE II   | 10/13/2006     | PDMMT    | 938.30                         | 938.60                  | 907.97                          | 30.3                      | NO            | 8                   | 20.0                 | 10                 | 0.01           | 18.0               | 15.0                    | SAPROLITE               | 1230464.4 301477.3                                  |
| MW76S   | TYPE II   | 10/13/2006     | PDMMT    | 938.10                         | 938.30                  | 907.73                          | 30.4                      | NO            | 8                   | 20.0                 | 10                 | 0.01           | 18.0               | 15.0                    | SAPROLITE               | 1230417.1 301417.7                                  |
| MW76D   | TYPE II   | 4/23/2012      | PDMMT    | 938.10                         | 938.40                  | 893.10                          | 45.0                      | YES           | 8                   | 35.0                 | 10                 | 0.01           | 32.0               | 2.0                     | SAPROLITE               | 1230420.5 301423.1                                  |
| MW77S   | TYPE II   | 1/16/2007      | PDMMT    | 937.80                         | 938.40                  | 908.07                          | 29.7                      | NO            | 8                   | 20.0                 | 10                 | 0.01           | 17.0               | 16.0                    | SAPROLITE               | 1230535.8 301559.5                                  |
| MW77D   | TYPE II   | 4/23/2012      | PDMMT    | 938.20                         | 938.40                  | 897.20                          | 41.0                      | YES           | 8                   | 20.0                 | 10                 | 0.01           | 33.0               | 2.0                     | SAPROLITE               | 1230539.3 301562.9                                  |
| MW78S   | TYPE II   | 1/16/2007      | PDMMT    | 938.40                         | 938.60                  | 908.51                          | 29.9                      | NO            | 8                   | 20.0                 | 10                 | 0.01           | 18.0               | 16.0                    | SAPROLITE               | 1230439.5 301455.1                                  |
| MW79S   | TYPE II   | 3/5/2007       | PDMMT    | 938.30                         | 938.60                  | 907.97                          | 30.3                      | NO            | 8                   | 20.0                 | 10                 | 0.01           | 17.5               | 16.0                    | SAPROLITE               | 1230472.5 301404.0                                  |

TABLE 6-2

TABLE 6-2: WELL CONSTRUCTION AND SURVEY INFORMATION  
Bonnell Aluminum, Inc., Newnan, Georgia  
PCC Permit Renewal Application, 2024

| WELL ID | WELL TYPE | DATE INSTALLED | DRILLER   | ELEVATION PVC CASING (ft NGVD) | PAD ELEVATION (ft NGVD) | ELEVATION WELL BOTTOM (ft NGVD) | TOTAL WELL DEPTH (ft bgs) | AUGER REFUSAL | AUGER DIAMETER (in) | DEPTH TO SCREEN (ft) | SCREEN LENGTH (ft) | SLOT SIZE (in) | DEPTH TO SAND (ft) | DEPTH TO BENTONITE (ft) | GEOLOGIC UNIT MONITORED | WELL COORDINATES NORTHING EASTING (State Plane, ft) |
|---------|-----------|----------------|-----------|--------------------------------|-------------------------|---------------------------------|---------------------------|---------------|---------------------|----------------------|--------------------|----------------|--------------------|-------------------------|-------------------------|-----------------------------------------------------|
| MW80S   | TYPE II   | 3/6/2007       | PDMMT     | 938.10                         | 938.60                  | 907.76                          | 30.3                      | NO            | 8                   | 20.0                 | 10                 | 0.01           | 17.5               | 16.0                    | SAPROLITE               | 1230560.6 301474.3                                  |
| MW81S   | TYPE II   | 3/6/2007       | PDMMT     | 938.20                         | 938.50                  | 907.87                          | 30.3                      | NO            | 8                   | 20.0                 | 10                 | 0.01           | 17.5               | 16.0                    | SAPROLITE               | 1230564.5 301554.7                                  |
| MW82S   | TYPE II   | 3/7/2007       | PDMMT     | 934.30                         | 934.60                  | 908.00                          | 26.3                      | NO            | 8                   | 20.0                 | 10                 | 0.01           | 14.3               | 16.0                    | SAPROLITE               | 1230420.4 301461.2                                  |
| MW82D   | TYPE II   | 4/23/2012      | PDMMT     | 934.30                         | 934.60                  | 900.30                          | 34.0                      | YES           | 8                   | 24.0                 | 10                 | 0.10           | 22.0               | 2.0                     | SAPROLITE               | 1230414.4 301467.4                                  |
| MW83S   | TYPE II   | 3/7/2007       | PDMMT     | 934.10                         | 934.60                  | 908.27                          | 25.8                      | NO            | 8                   | 20.0                 | 10                 | 0.01           | 14.3               | 16.0                    | SAPROLITE               | 1230475.0 301538.1                                  |
| MW83D   | TYPE II   | 1/11/2016      | Atlas Geo | 934.20                         | 934.50                  | 893.20                          | 41.0                      | YES           | 8-8.25              | 31.0                 | 10                 | 0.01           | 28.0               | 21.0                    | SAPROLITE/PWR           | 1230466.8 301547.5                                  |
| MW85D   | TYPE III  | 10/26/2009     | PDMMT     | 938.30                         | 938.50                  | 898.20                          | 40.0                      | YES           | 10 to 4.5           | 35.0                 | 5                  | 0.01           | 33.0               | 36.0                    | PWR                     | 1230553.5 301547.5                                  |
| MW86D   | TYPE III  | 10/27/2009     | PDMMT     | 938.20                         | 938.50                  | 898.20                          | 40.0                      | YES           | 10 to 4.5           | 35.0                 | 5                  | 0.01           | 33.0               | 36.0                    | SAPROLITE               | 1230493.3 301505.2                                  |
| MW87D   | TYPE III  | 12/29/2010     | PDMMT     | 938.30                         | 938.60                  | 893.30                          | 45.0                      | NO            | 10 to 4.5           | 43.0                 | 2                  | 0.01           | 41.0               | 38.0                    | PWR                     | 1230472.8 301478.7                                  |
| MW88D   | TYPE III  | 12/29/2010     | PDMMT     | 937.90                         | 938.50                  | 902.90                          | 35.0                      | NO            | 10 to 4.5           | 33.0                 | 2                  | 0.01           | 30.0               | 28.0                    | PWR                     | 1230555.3 301550.6                                  |
| MW89D   | TYPE III  | 1/11/2010      | PDMMT     | 938.30                         | 938.60                  | 903.30                          | 35.0                      | NO            | 10 to 4.5           | 33.0                 | 2                  | 0.01           | 31.0               | 29.0                    | PWR                     | 1230471.1 301476.4                                  |
| MW90D   | TYPE II   | 9/20/2010      | PDMMT     | 861.20                         | 861.20                  | 833.90                          | 27.3                      | YES           | 8                   | 17.3                 | 10                 | 0.01           | 15.0               | 13.0                    | SAPROLITE               | 1228839.8 299693.7                                  |
| MW91D   | TYPE II   | 9/20/2010      | PDMMT     | 873.80                         | 870.70                  | 836.40                          | 37.4                      | YES           | 8                   | 27.4                 | 10                 | 0.01           | 25.0               | 23.0                    | SAPROLITE               | 1228828.0 299787.6                                  |
| MW92D   | TYPE II   | 9/21/2010      | PDMMT     | 931.40                         | 928.20                  | 889.40                          | 42.0                      | YES           | 8                   | 32.0                 | 10                 | 0.01           | 30.0               | 30.0                    | SAPROLITE               | 1228872.9 300493.6                                  |
| MW93D   | TYPE II   | 9/21/2010      | PDMMT     | 905.00                         | 901.70                  | 869.50                          | 35.5                      | YES           | 8                   | 25.0                 | 10                 | 0.01           | 23.0               | 21.0                    | SAPROLITE               | 1229054.9 300446.3                                  |
| MW93S   | TYPE II   | 7/9/1990       | LAYNE     | 868.60                         | 868.90                  | 853.60                          | 15.0                      | NO            | 8                   | 5.0                  | 10                 | 0.01           | 4.0                | 2.0                     | SAPROLITE               | 1229431.6 299969.9                                  |
| MW95D   | TYPE II   | 7/9/1990       | LAYNE     | 868.80                         | 869.00                  | 838.80                          | 30.0                      | YES           | 8                   | 20.0                 | 10                 | 0.01           | 17.5               | 15.5                    | SAPROLITE               | 1229434.9 299971.4                                  |
| MW95S   | TYPE II   | 7/11/1990      | LAYNE     | 887.10                         | 885.10                  | 871.10                          | 16.0                      | NO            | 8                   | 6.0                  | 10                 | 0.01           | 5.0                | 3.0                     | SAPROLITE               | 1229356.6 300244.8                                  |
| MW95D   | TYPE II   | 7/11/1990      | LAYNE     | 886.90                         | 885.10                  | 858.40                          | 28.5                      | YES           | 8                   | 18.8                 | 10                 | 0.01           | 17.0               | 14.7                    | SAPROLITE               | 1229355.7 300243.2                                  |
| MW95S   | TYPE II   | 7/12/1990      | LAYNE     | 866.20                         | 866.10                  | 851.20                          | 15.0                      | NO            | 8                   | 5.0                  | 10                 | 0.01           | 4.0                | 2.0                     | SAPROLITE               | 1229234.4 299897.6                                  |
| MW95D   | TYPE II   | 7/12/1990      | LAYNE     | 865.80                         | 865.90                  | 821.00                          | 44.8                      | YES           | 8                   | 35.0                 | 10                 | 0.01           | 32.5               | 14.5                    | SAPROLITE               | 1229237.4 299892.4                                  |
| MW95S   | TYPE II   | 7/12/1990      | LAYNE     | 878.60                         | 879.00                  | 862.60                          | 16.0                      | NO            | 8                   | 6.0                  | 10                 | 0.01           | 4.5                | 2.0                     | SAPROLITE               | 1229148.9 300089.4                                  |
| MW95D   | TYPE II   | 7/19/1990      | LAYNE     | 879.10                         | 879.00                  | 834.10                          | 45.0                      | YES           | 8                   | 35.0                 | 10                 | 0.01           | 33.0               | 30.5                    | SAPROLITE               | 1229151.0 300086.6                                  |
| MW95D   | TYPE II   | 7/19/1990      | LAYNE     | 877.10                         | 877.10                  | 807.10                          | 70.0                      | YES           | 8                   | 60.0                 | 10                 | 0.01           | 57.5               | 55.0                    | SAPROLITE               | 1229244.2 299658.3                                  |
| MW95D   | TYPE II   | 11/6/1990      | LAYNE     | 861.70                         | 862.00                  | 825.50                          | 36.2                      | YES           | 8                   | 26.2                 | 10                 | 0.01           | 22.5               | 20.0                    | SAPROLITE               | 1228927.5 299726.9                                  |
| MW95D   | TYPE II   | 11/5/1990      | LAYNE     | 894.30                         | 894.40                  | 875.30                          | 19.0                      | YES           | 8                   | 9.0                  | 10                 | 0.01           | 6.5                | 4.5                     | SAPROLITE               | 1229121.3 300644.2                                  |
| MW95D   | TYPE II   | 10/4/1991      | SUNRISE   | 874.10                         | 874.10                  | 832.10                          | 42.0                      | YES           | 8                   | 32.0                 | 10                 | 0.01           | 30.0               | 28.0                    | SAPROLITE               | 1228980.9 299878.4                                  |
| MWBR1   | TYPE III  | 9/29/1992      | LAYNE     | 903.60                         | 900.60                  | 818.60                          | 85.0                      | N/A           | 8-12                | 65.0                 | 20                 | 0.01           | 62.0               | 60.0                    | BEDROCK                 | 1230247.0 300278.5                                  |
| MWBR3   | TYPE III  | 9/30/1992      | LAYNE     | 865.70                         | 865.50                  | 702.98                          | 162.7                     | N/A           | 4-12                | 62.5                 | OPEN               | N/A            | N/A                | N/A                     | BEDROCK                 | 1229242.3 299881.4                                  |
| MWBR5   | TYPE III  | 10/6/1992      | LAYNE     | 903.10                         | 900.90                  | 794.10                          | 109.0                     | N/A           | 4-8                 | 85.0                 | OPEN               | N/A            | N/A                | N/A                     | BEDROCK                 | 1230277.5 300286.1                                  |
| MWBR6   | TYPE III  | 2/8/1993       | LAYNE     | 879.60                         | 879.40                  | 750.60                          | 129.0                     | N/A           | 8-12                | 89.0                 | OPEN               | N/A            | N/A                | N/A                     | BEDROCK                 | 1229266.6 299669.3                                  |
| RW1     | TYPE II   | 4/17/1994      | LAYNE     | 933.60                         | 934.19                  | 883.60                          | 50.0                      | NO            | 12                  | 20.0                 | 30                 | 0.02           | 16.0               | 14.0                    | SAPROLITE               | 1230534.5 301650.7                                  |
| RW3     | TYPE II   | 8/9/1993       | ENV. EX.  | 900.40                         | 901.10                  | 855.40                          | 45.0                      | NO            | 12                  | 15.0                 | 30                 | 0.01           | 13.0               | 11.0                    | SAPROLITE               | 1230193.0 300262.8                                  |
| RW4     | TYPE II   | 4/22/1994      | LAYNE     | 907.70                         | 908.10                  | 855.70                          | 52.0                      | NO            | 12                  | 22.0                 | 30                 | 0.02           | 15.0               | 14.0                    | SAPROLITE               | 1229971.5 300939.3                                  |
| RW5     | TYPE II   | 4/13/1994      | LAYNE     | 901.30                         | 902.30                  | 851.30                          | 50.0                      | NO            | 12                  | 20.0                 | 30                 | 0.02           | 16.0               | 15.0                    | SAPROLITE               | 1229668.3 300437.9                                  |
| RW6     | TYPE II   | 12/7/1992      | LAYNE     | 909.60                         | 909.10                  | 878.60                          | 31.0                      | NO            | 18                  | 11.0                 | 20                 | 0.02           | 9.0                | 7.5                     | SAPROLITE               | 1229378.3 300540.5                                  |
| RW7     | TYPE II   | 7/14/1994      | LAYNE     | 866.60                         | 866.80                  | 806.60                          | 60.0                      | NO            | 14                  | 20.0                 | 40                 | 0.02           | 18.0               | 16.5                    | SAPROLITE               | 1229360.9 299944.2                                  |
| RW8     | TYPE II   | 11/20/1997     | ENV. EX.  | 905.90                         | 906.00                  | 873.65                          | 32.3                      | YES           | 10                  | 12.0                 | 20                 | 0.02           | 10.0               | 7.5                     | SAPROLITE               | 1229497.3 300603.8                                  |
| RW9     | TYPE II   | 11/17/1997     | ENV. EX.  | 901.50                         | 901.20                  | 870.50                          | 31.0                      | YES           | 10                  | 11.0                 | 20                 | 0.02           | 9.0                | 7.0                     | SAPROLITE               | 1229572.2 300517.1                                  |
| RW10    | TYPE II   | 11/12/1997     | ENV. EX.  | 901.70                         | 901.80                  | 871.21                          | 30.5                      | YES           | 10                  | 11.0                 | 20                 | 0.02           | 9.0                | 7.0                     | SAPROLITE               | 1229600.9 300461.1                                  |
| RW11    | TYPE II   | 11/11/1997     | ENV. EX.  | 900.50                         | 900.50                  | 859.98                          | 40.5                      | YES           | 10                  | 10.0                 | 30                 | 0.02           | 8.0                | 6.0                     | SAPROLITE               | 1229773.1 300550.4                                  |
| RW13    | TYPE II   | 11/19/1997     | ENV. EX.  | 887.60                         | 887.50                  | 864.37                          | 23.2                      | YES           | 10                  | 8.0                  | 15                 | 0.02           | 6.5                | 4.0                     | SAPROLITE               | 1229337.9 300289.1                                  |
| RW14    | TYPE II   | 12/28/2011     | KILMAN    | 931.20                         | 931.70                  | 888.04                          | 43.2                      | YES           | 10                  | 22.0                 | 20                 | 0.01           | 19.0               | 17.0                    | SAPROLITE               | 1230345.3 301356.6                                  |
| RW15    | TYPE II   | 12/29/2011     | KILMAN    | 931.10                         | 931.70                  | 883.44                          | 47.7                      | YES           | 10                  | 28.0                 | 20                 | 0.01           | 25.0               | 22.0                    | SAPROLITE               | 1230336.1 301363.8                                  |
| PZM1A   | TYPE II   | 10/29/1996     | ENV. EX.  | 934.30                         | 934.50                  | 907.70                          | 26.6                      | NO            | 2                   | 22.0                 | 5                  | 0.01           | 20.0               | 18.0                    | SAPROLITE               | 1230555.5 301669.6                                  |
| PZM1B   | TYPE II   | 10/29/1996     | ENV. EX.  | 934.30                         | 934.50                  | 911.30                          | 23.0                      | NO            | 2                   | 18.0                 | 5                  | 0.01           | 15.5               | 10.0                    | SAPROLITE               | 1230550.1 301675.9                                  |
| PZM3A   | TYPE II   | 10/28/1996     | ENV. EX.  | 903.00                         | 900.00                  | 875.70                          | 27.3                      | NO            | 2                   | 18.6                 | 5                  | 0.01           | 12.6               | 8.5                     | SAPROLITE               | 1230206.0 300254.5                                  |
| PZM3B   | TYPE II   | 10/28/1996     | ENV. EX.  | 902.90                         | 900.00                  | 878.40                          | 24.5                      | NO            | 2                   | 19.5                 | 5                  | 0.01           | 15.0               | 8.0                     | SAPROLITE               | 1230219.8 300255.1                                  |
| PZM4A   | TYPE II   | 10/28/1996     | ENV. EX.  | 910.30                         | 907.80                  | 893.29                          | 17.0                      | NO            | 2                   | 9.3                  | 5                  | 0.01           | 6.0                | 2.0                     | SAPROLITE               | 1229975.7 300926.3                                  |
| PZM4B   | TYPE II   | 10/28/1996     | ENV. EX.  | 909.70                         | 907.00                  | 891.85                          | 17.9                      | NO            | 2                   | 10.0                 | 5                  | 0.01           | 7.0                | 4.0                     | SAPROLITE               | 1229994.7 300930.4                                  |

TABLE 6-2



TABLE 6-2: WELL CONSTRUCTION AND SURVEY INFORMATION  
Bonnell Aluminum, Inc., Newnan, Georgia  
PCC Permit Renewal Application, 2024

| WELL ID | WELL TYPE | DATE INSTALLED | DRILLER  | ELEVATION PVC CASING (ft NGVD) | PAD ELEVATION (ft NGVD) | ELEVATION WELL BOTTOM (ft NGVD) | TOTAL WELL DEPTH (ft bgs) | AUGER REFUSAL | AUGER DIAMETER (in) | DEPTH TO SCREEN (ft) | SCREEN LENGTH (ft) | SLOT SIZE (in) | DEPTH TO SAND (ft) | DEPTH TO BENTONITE (ft) | GEOLOGIC UNIT MONITORED | WELL COORDINATES |                           |
|---------|-----------|----------------|----------|--------------------------------|-------------------------|---------------------------------|---------------------------|---------------|---------------------|----------------------|--------------------|----------------|--------------------|-------------------------|-------------------------|------------------|---------------------------|
|         |           |                |          |                                |                         |                                 |                           |               |                     |                      |                    |                |                    |                         |                         | NORTHING         | EASTING (State Plane, ft) |
| PZM5A   | TYPE II   | 10/28/1996     | ENV. EX. | 905.30                         | 902.40                  | 869.13                          | 36.2                      | NO            | 2                   | 28.0                 | 5                  | 0.01           | 25.0               | 20.0                    | SAPROLITE               | 1229659.9        | 300443.6                  |
| PZM5B   | TYPE II   | 10/28/1996     | ENV. EX. | 905.00                         | 902.30                  | 868.87                          | 36.1                      | NO            | 2                   | 28.4                 | 5                  | 0.01           | 25.0               | 20.0                    | SAPROLITE               | 1229671.1        | 300451.8                  |
| PZM6A   | TYPE II   | 10/28/1996     | ENV. EX. | 911.80                         | 908.80                  | 874.41                          | 37.4                      | NO            | 2                   | 30.0                 | 5                  | 0.01           | 25.0               | 20.0                    | SAPROLITE               | 1229383.1        | 300551.4                  |
| PZM6B   | TYPE II   | 10/28/1996     | ENV. EX. | 912.00                         | 909.00                  | 873.61                          | 38.4                      | NO            | 2                   | 30.0                 | 5                  | 0.01           | 25.0               | 20.0                    | SAPROLITE               | 1229381.8        | 300566.5                  |
| PZM8A   | TYPE II   | 11/24/1997     | ENV. EX. | 909.30                         | 906.60                  | 876.62                          | 32.7                      | NO            | 8                   | 20.0                 | 10                 | 0.01           | 18.0               | 16.0                    | SAPROLITE               | 1229488.6        | 300610.9                  |
| PZM8B   | TYPE II   | 11/24/1997     | ENV. EX. | 907.90                         | 905.10                  | 875.15                          | 32.8                      | NO            | 8                   | 20.0                 | 10                 | 0.01           | 18.0               | 16.0                    | SAPROLITE               | 1229505.9        | 300587.1                  |
| PZM9A   | TYPE II   | 11/21/1997     | ENV. EX. | 904.60                         | 901.70                  | 872.60                          | 32.0                      | YES           | 8                   | 19.0                 | 10                 | 0.01           | 17.0               | 15.0                    | SAPROLITE               | 1229585.6        | 300526.0                  |
| PZM9B   | TYPE II   | 11/21/1997     | ENV. EX. | 904.90                         | 901.70                  | 873.13                          | 31.8                      | YES           | 8                   | 19.0                 | 10                 | 0.01           | 17.0               | 15.0                    | SAPROLITE               | 1229591.9        | 300533.2                  |
| PZM10A  | TYPE II   | 11/21/1997     | ENV. EX. | 904.70                         | 901.80                  | 871.62                          | 33.1                      | YES           | 8                   | 20.0                 | 10                 | 0.01           | 18.0               | 16.0                    | SAPROLITE               | 1229594.7        | 300474.0                  |
| PZM10B  | TYPE II   | 11/21/1997     | ENV. EX. | 904.30                         | 901.50                  | 871.43                          | 32.9                      | NO            | 8                   | 20.0                 | 10                 | 0.01           | 17.0               | 15.0                    | SAPROLITE               | 1229586.4        | 300488.6                  |
| PZM11A  | TYPE II   | 11/24/1997     | ENV. EX. | 903.40                         | 900.60                  | 870.49                          | 32.9                      | NO            | 8                   | 10.0                 | 20                 | 0.01           | 18.0               | 6.0                     | SAPROLITE               | 1229764.4        | 300541.7                  |
| PZM11B  | TYPE II   | 11/21/1997     | ENV. EX. | 903.20                         | 900.60                  | 870.51                          | 32.7                      | NO            | 8                   | 10.0                 | 20                 | 0.01           | 8.0                | 6.0                     | SAPROLITE               | 1229783.5        | 300572.2                  |
| PZM12A  | TYPE II   | 11/21/1997     | ENV. EX. | 903.00                         | 900.30                  | 870.04                          | 33.0                      | NO            | 8                   | 10.0                 | 20                 | 0.01           | 8.0                | 6.0                     | SAPROLITE               | 1229798.1        | 300592.6                  |
| PZM12B  | TYPE II   | 11/21/1997     | ENV. EX. | 900.80                         | 899.20                  | 868.01                          | 32.8                      | NO            | 8                   | 10.0                 | 20                 | 0.01           | 8.0                | 6.0                     | SAPROLITE               | 1229826.2        | 300589.3                  |
| PZM13A  | TYPE II   | 11/24/1997     | ENV. EX. | 890.50                         | 887.70                  | 865.07                          | 25.4                      | YES           | 8                   | 13.0                 | 10                 | 0.01           | 11.0               | 9.0                     | SAPROLITE               | 1229346.6        | 300282.6                  |
| PZM13B  | TYPE II   | 11/24/1997     | ENV. EX. | 890.80                         | 888.10                  | 867.80                          | 23.0                      | YES           | 8                   | 13.0                 | 10                 | 0.01           | 11.0               | 9.0                     | SAPROLITE               | 1229356.8        | 300275.5                  |

Notes:

- 1) bgs = below ground surface
- 2) in = inches
- 3) ft = feet
- 4) N/A = Not Available
- 5) NGVD = National Geodetic Vertical Datum
- 6) NM = Not Measured
- 7) PWR = Partially Weathered Rock
- 8) Type II wells are constructed with a single casing
- 9) Type III wells are constructed with a double casing.

Prepared by/Date: AWE/10-19-2021  
Checked by/Date: MPL/10-19-2021

**TABLE 6-3: SUMMARY OF TOP OF BEDROCK ELEVATION**  
**Bonnell Aluminum, Inc., Newnan, Georgia**  
**PCC Permit Renewal Application, 2024**

| <b>BORING<br/>NUMBER</b> | <b>GROUND<br/>SURFACE<br/>ELEVATION</b> | <b>DEPTH TO<br/>TOP OF<br/>ROCK</b> | <b>TOP OF ROCK<br/>ELEVATION</b> |
|--------------------------|-----------------------------------------|-------------------------------------|----------------------------------|
| MW1D                     | 932.38                                  | 65.50                               | 866.88                           |
| MW2DR                    | 916.04                                  | 39.50                               | 876.54                           |
| MW4D                     | 908.01                                  | 35.20                               | 872.81                           |
| MW6D                     | 904.30                                  | 43.80                               | 860.50                           |
| MW7D                     | 900.67                                  | 47.50                               | 853.17                           |
| MW8D                     | 890.30                                  | 39.50                               | 850.80                           |
| MW9D                     | 880.07                                  | 48.30                               | 831.77                           |
| MW12D                    | 906.83                                  | 38.10                               | 868.73                           |
| MW15D                    | 918.97                                  | 49.00                               | 869.97                           |
| MW16D                    | 911.38                                  | 31.40                               | 879.98                           |
| MW17D                    | 910.86                                  | 34.40                               | 876.46                           |
| MW18D                    | 901.47                                  | 34.60                               | 866.87                           |
| MW19D                    | 906.91                                  | 43.20                               | 863.71                           |
| MW20D                    | 879.99                                  | 40.10                               | 839.89                           |
| MW21D                    | 872.09                                  | 40.60                               | 831.49                           |
| MW22D                    | 902.65                                  | 43.80                               | 858.85                           |
| MW23D                    | 913.55                                  | 40.70                               | 872.85                           |
| MW24D                    | 926.05                                  | 38.50                               | 887.55                           |
| MW25D                    | 920.93                                  | 40.80                               | 880.13                           |
| MW26D                    | 931.63                                  | 45.60                               | 886.03                           |
| MW27D                    | 910.99                                  | 29.30                               | 881.69                           |
| MW28D                    | 908.23                                  | 28.80                               | 879.43                           |
| MW29D                    | 903.31                                  | 21.50                               | 881.81                           |
| MW30D                    | 925.54                                  | 27.80                               | 897.74                           |
| MW31D                    | 925.57                                  | 37.00                               | 888.57                           |
| MW32D                    | 920.45                                  | 45.00                               | 875.45                           |
| MW33D                    | 936.78                                  | 30.00                               | 906.78                           |
| MW34D                    | 938.59                                  | 35.00                               | 903.59                           |
| MW35D                    | 919.97                                  | 24.00                               | 895.97                           |
| MW36S                    | 940.97                                  | 25.00                               | 915.97                           |
| MW36D                    | 941.07                                  | 40.40                               | 900.67                           |
| MW37D                    | 932.23                                  | 63.00                               | 869.23                           |
| MW38D                    | 962.46                                  | 52.00                               | 910.46                           |
| MW39D                    | 927.72                                  | 35.20                               | 892.52                           |
| MW40D                    | 938.09                                  | 26.00                               | 912.09                           |
| MW41D                    | 938.10                                  | 28.00                               | 910.10                           |
| MW44D                    | 888.05                                  | 39.50                               | 848.55                           |
| MWOS1D                   | 869.11                                  | 30.00                               | 839.11                           |
| MWOS2D                   | 884.75                                  | 28.50                               | 856.25                           |
| MWOS3D                   | 866.25                                  | 44.80                               | 821.45                           |
| MWOS4D                   | 879.05                                  | 45.00                               | 834.05                           |
| MWOS5D                   | 876.89                                  | 70.00                               | 806.89                           |
| MWOS6D                   | 861.65                                  | 36.20                               | 825.45                           |
| MWOS7D                   | 894.63                                  | 19.00                               | 875.63                           |
| MWOS8D                   | 873.83                                  | 42.00                               | 831.83                           |
| C1                       | 922.00                                  | 74.60                               | 847.40                           |
| C2                       | 939.00                                  | 144.00                              | 795.00                           |
| C3                       | 878.00                                  | 125.00                              | 753.00                           |

Note:

1. Data source: 2014 PCC Permit Renewal Application.

Prepared by/Date: MPL/02-18-2024

Checked by/Date: JMB/02-29-2024

**TABLE 6-4: GROUNDWATER ELEVATION DATA, MARCH 2023**  
**Bonnell Aluminum, Inc., Newnan, Georgia**  
**PCC Permit Renewal Application, 2024**

| WELL NUMBER | DATE      | WELL CASING ELEVATION (feet) | DEPTH TO WATER BELOW CASING (feet) | WATER TABLE ELEVATION (feet MSL) | TOTAL WELL DEPTH (feet) | DEPTH TO SCREEN (feet) | SCREEN LENGTH (feet) | MONITORED UNIT |
|-------------|-----------|------------------------------|------------------------------------|----------------------------------|-------------------------|------------------------|----------------------|----------------|
| MW26D       | 3/13/2023 | 935.50                       | 17.81                              | 917.69                           | 45.6                    | 35.1                   | 10                   | SAPROLITE      |
| MW27D       | 3/13/2023 | 912.30                       | 4.78                               | 907.52                           | 29.3                    | 18.8                   | 10                   | SAPROLITE      |
| MW41D       | 3/13/2023 | 938.20                       | 15.01                              | 923.19                           | 28.0                    | 18.0                   | 10                   | SAPROLITE      |
| MW73S       | 3/13/2023 | 938.30                       | 14.80                              | 923.50                           | 28.9                    | 18.0                   | 10                   | SAPROLITE      |
| MW75S       | 3/13/2023 | 938.30                       | 17.85                              | 920.45                           | 30.3                    | 20.0                   | 10                   | SAPROLITE      |
| MW76S       | 3/13/2023 | 938.10                       | 20.39                              | 917.71                           | 30.4                    | 20.0                   | 10                   | SAPROLITE      |
| MW76D       | 3/13/2023 | 938.10                       | 19.93                              | 918.17                           | 45.0                    | 35.0                   | 10                   | SAPROLITE      |
| MW77S       | 3/13/2023 | 937.80                       | 15.30                              | 922.50                           | 29.7                    | 20.0                   | 10                   | SAPROLITE      |
| MW77D       | 3/13/2023 | 938.20                       | 15.38                              | 922.82                           | 41.0                    | 20.0                   | 10                   | SAPROLITE      |
| MW78S       | 3/13/2023 | 938.40                       | 18.94                              | 919.46                           | 29.9                    | 20.0                   | 10                   | SAPROLITE      |
| MW79S       | 3/13/2023 | 938.30                       | 22.83                              | 915.47                           | 30.3                    | 20.0                   | 10                   | SAPROLITE      |
| MW80S       | 3/13/2023 | 938.10                       | 16.30                              | 921.80                           | 30.3                    | 20.0                   | 10                   | SAPROLITE      |
| MW81S       | 3/13/2023 | 938.20                       | 15.25                              | 922.95                           | 30.3                    | 20.0                   | 10                   | SAPROLITE      |
| MW82S       | 3/13/2023 | 934.30                       | 15.25                              | 919.05                           | 26.3                    | 20.0                   | 10                   | SAPROLITE      |
| MW82D       | 3/13/2023 | 934.30                       | 14.93                              | 919.37                           | 34.0                    | 24.0                   | 10                   | SAPROLITE      |
| MW83S       | 3/13/2023 | 934.10                       | 11.41                              | 922.69                           | 25.8                    | 20.0                   | 10                   | SAPROLITE      |
| MW83D       | 3/13/2023 | 934.20                       | 11.58                              | 922.62                           | 41.0                    | 31.0                   | 10                   | SAPROLITE/PWR  |
| MW85D       | 3/13/2023 | 938.30                       | 15.72                              | 922.58                           | 45.0                    | 40.0                   | 5                    | PWR            |
| MW86D       | 3/13/2023 | 938.20                       | 16.58                              | 921.62                           | 40.0                    | 35.0                   | 5                    | SAPROLITE      |
| MW87D       | 3/13/2023 | 938.30                       | 17.99                              | 920.31                           | 45.0                    | 43.0                   | 2                    | PWR            |
| MW88D       | 3/13/2023 | 937.90                       | 15.15                              | 922.75                           | 35.0                    | 33.0                   | 2                    | PWR            |
| MW89D       | 3/13/2023 | 938.30                       | 17.14                              | 921.16                           | 35.0                    | 33.0                   | 2                    | PWR            |
| RW14        | 3/13/2023 | 931.20                       | 20.99                              | 910.21                           | 43.2                    | 22.0                   | 20                   | SAPROLITE      |
| RW15        | 3/13/2023 | 931.10                       | 15.15                              | 915.95                           | 47.7                    | 28.0                   | 20                   | SAPROLITE      |
| MW2SR       | 3/14/2023 | 918.60                       | 5.52                               | 913.08                           | 13.5                    | 2.5                    | 10                   | SAPROLITE      |
| MW2DR       | 3/14/2023 | 918.40                       | 6.90                               | 911.50                           | 39.5                    | 29.5                   | 10                   | SAPROLITE      |
| MW4SR       | 3/14/2023 | 909.80                       | 22.29                              | 887.51                           | 28.0                    | 18.0                   | 10                   | SAPROLITE      |
| MW7D        | 3/14/2023 | 903.30                       | 14.22                              | 889.08                           | 47.5                    | 37.0                   | 10                   | SAPROLITE      |
| MW13S       | 3/13/2023 | 952.50                       | 15.28                              | 937.22                           | 25.0                    | 15.0                   | 10                   | SAPROLITE      |
| MW17D       | 3/14/2023 | 912.60                       | 25.74                              | 886.86                           | 34.4                    | 24.0                   | 10                   | SAPROLITE      |
| MW19S       | 3/14/2023 | 906.90                       | 23.60                              | 883.30                           | 31.2                    | 20.8                   | 10                   | SAPROLITE      |
| MW19D       | 3/14/2023 | 907.00                       | 23.74                              | 883.26                           | 43.2                    | 32.8                   | 10                   | SAPROLITE      |
| MW20D       | 3/13/2023 | 880.00                       | 7.37                               | 872.63                           | 40.1                    | 29.6                   | 10                   | SAPROLITE      |
| MW21D       | 3/14/2023 | 871.90                       | 2.86                               | 869.04                           | 40.6                    | 30.2                   | 10                   | SAPROLITE      |
| MW24D       | 3/13/2023 | 926.20                       | 27.50                              | 898.70                           | 38.5                    | 28.0                   | 10                   | SAPROLITE      |
| MW27S       | 3/13/2023 | 914.20                       | 5.80                               | 908.40                           | 11.7                    | 1.3                    | 10                   | SAPROLITE      |
| MW28S       | 3/14/2023 | 909.60                       | 5.82                               | 903.78                           | 12.7                    | 2.3                    | 10                   | SAPROLITE      |
| MW31D       | 3/14/2023 | 928.80                       | 33.82                              | 894.98                           | 37.0                    | 27.0                   | 10                   | SAPROLITE      |
| MW32S       | 3/14/2023 | 922.70                       | 25.18                              | 897.52                           | 35.0                    | 25.0                   | 10                   | SAPROLITE      |
| MW36D       | 3/13/2023 | 941.00                       | 13.38                              | 927.62                           | 40.4                    | 35.0                   | 5                    | SAPROLITE      |
| MW37D       | 3/13/2023 | 932.40                       | 5.68                               | 926.72                           | 63.0                    | 53.0                   | 10                   | SAPROLITE      |
| MW39D       | 3/14/2023 | 927.90                       | 22.93                              | 904.97                           | 35.2                    | 25.0                   | 10                   | SAPROLITE      |
| MW40D       | 3/13/2023 | 938.70                       | 12.97                              | 925.73                           | 26.0                    | 16.0                   | 10                   | SAPROLITE      |
| MW42S       | 3/14/2023 | 891.70                       | 19.24                              | 872.46                           | 25.5                    | 15.5                   | 10                   | SAPROLITE      |
| MW43S       | 3/14/2023 | 881.60                       | 8.11                               | 873.49                           | 22.0                    | 6.8                    | 10                   | SAPROLITE      |
| MW44S       | 3/14/2023 | 890.70                       | 5.50                               | 885.20                           | 19.0                    | 7.2                    | 10                   | SAPROLITE      |
| MW44D       | 3/14/2023 | 890.80                       | 5.66                               | 885.14                           | 39.5                    | 29.5                   | 10                   | SAPROLITE      |
| MW45S       | 3/14/2023 | 898.00                       | 8.33                               | 889.67                           | 16.3                    | 4.0                    | 10                   | SAPROLITE      |
| MW48S       | 3/14/2023 | 898.40                       | 1.16                               | 897.24                           | 21.0                    | 5.0                    | 15                   | SAPROLITE      |
| MW49S       | 3/14/2023 | 901.20                       | 3.46                               | 897.74                           | 14.0                    | 4.0                    | 10                   | SAPROLITE      |
| MW50S       | 3/14/2023 | 898.50                       | 1.69                               | 896.81                           | 15.0                    | 5.0                    | 10                   | SAPROLITE      |
| MW51S       | 3/14/2023 | 929.10                       | 13.03                              | 916.07                           | 21.1                    | 8.5                    | 10                   | SAPROLITE      |
| MW52S       | 3/14/2023 | 929.90                       | 12.90                              | 917.00                           | 19.5                    | 6.5                    | 10                   | SAPROLITE      |
| MW54S       | 3/14/2023 | 895.90                       | 7.75                               | 888.15                           | 17.9                    | 5.0                    | 10                   | SAPROLITE      |
| MWOS1S      | 3/14/2023 | 868.60                       | 3.77                               | 864.83                           | 15.0                    | 5.0                    | 10                   | SAPROLITE      |
| MWOS3D      | 3/14/2023 | 865.80                       | 4.09                               | 861.71                           | 44.8                    | 35.0                   | 10                   | SAPROLITE      |
| MWOS5D      | 3/13/2023 | 877.10                       | 10.82                              | 866.28                           | 70.0                    | 60.0                   | 10                   | SAPROLITE      |
| MWOS6D      | 3/14/2023 | 861.70                       | 4.42                               | 857.28                           | 36.2                    | 26.2                   | 10                   | SAPROLITE      |
| MWOS7D      | 3/14/2023 | 894.30                       | 6.70                               | 887.60                           | 19.0                    | 9.0                    | 10                   | SAPROLITE      |
| MWOS8D      | 3/14/2023 | 874.10                       | 9.88                               | 864.22                           | 42.0                    | 32.0                   | 10                   | SAPROLITE      |
| MWBR3       | 3/14/2023 | 865.70                       | 5.39                               | 860.31                           | 162.7                   | 62.5                   | OPEN                 | BEDROCK        |
| MWBR6       | 3/13/2023 | 879.60                       | 11.11                              | 868.49                           | 129.0                   | 89.0                   | OPEN                 | BEDROCK        |

**TABLE 6-4: GROUNDWATER ELEVATION DATA, MARCH 2023**  
**Bonnell Aluminum, Inc., Newnan, Georgia**  
**PCC Permit Renewal Application, 2024**

| WELL NUMBER | DATE      | WELL CASING ELEVATION (feet) | DEPTH TO WATER BELOW CASING (feet) | WATER TABLE ELEVATION (feet MSL) | TOTAL WELL DEPTH (feet) | DEPTH TO SCREEN (feet) | SCREEN LENGTH (feet) | MONITORED UNIT |
|-------------|-----------|------------------------------|------------------------------------|----------------------------------|-------------------------|------------------------|----------------------|----------------|
| MW18D       | 3/14/2023 | 903.90                       | 15.99                              | 887.91                           | 34.6                    | 24.1                   | 10                   | SAPROLITE      |
| MW18S       | 3/14/2023 | 903.80                       | 15.50                              | 888.30                           | 20.8                    | 10.3                   | 10                   | SAPROLITE      |
| MW20S       | 3/13/2023 | 880.30                       | 7.02                               | 873.28                           | 15.5                    | 5.1                    | 10                   | SAPROLITE      |
| MW26S       | 3/13/2023 | 935.50                       | 17.20                              | 918.30                           | 21.9                    | 11.5                   | 10                   | SAPROLITE      |
| MW28D       | 3/14/2023 | 909.80                       | 5.52                               | 904.28                           | 28.8                    | 18.4                   | 10                   | SAPROLITE      |
| MW32D       | 3/14/2023 | 922.60                       | 25.70                              | 896.90                           | 45.0                    | 35.0                   | 10                   | SAPROLITE      |
| MW35D       | 3/14/2023 | 922.30                       | 20.49                              | 901.81                           | 24.0                    | 14.0                   | 10                   | SAPROLITE      |
| MW36S       | 3/13/2023 | 940.90                       | 12.77                              | 928.13                           | 25.0                    | 15.0                   | 10                   | SAPROLITE      |
| MW53S       | 3/14/2023 | 904.20                       | 11.45                              | 892.75                           | 20.8                    | 8.0                    | 10                   | SAPROLITE      |
| MW90D       | 3/14/2023 | 861.20                       | 7.65                               | 853.55                           | 27.3                    | 17.3                   | 10                   | SAPROLITE      |
| MW91D       | 3/14/2023 | 873.80                       | 13.80                              | 860.00                           | 37.4                    | 27.4                   | 10                   | SAPROLITE      |
| MW92D       | 3/14/2023 | 931.40                       | 41.52                              | 889.88                           | 42.0                    | 32.0                   | 10                   | SAPROLITE      |
| MW93D       | 3/14/2023 | 905.00                       | 22.39                              | 882.61                           | 35.5                    | 25.0                   | 10                   | SAPROLITE      |
| MWOS1D      | 3/14/2023 | 868.80                       | 4.04                               | 864.76                           | 30.0                    | 20.0                   | 10                   | SAPROLITE      |
| MWOS2D      | 3/14/2023 | 886.90                       | 9.38                               | 877.52                           | 28.5                    | 18.8                   | 10                   | SAPROLITE      |
| MWOS2S      | 3/14/2023 | 887.10                       | 9.20                               | 877.90                           | 16.0                    | 6.0                    | 10                   | SAPROLITE      |
| MWOS3S      | 3/14/2023 | 866.20                       | 4.20                               | 862.00                           | 15.0                    | 5.0                    | 10                   | SAPROLITE      |
| MWOS4D      | 3/14/2023 | 879.10                       | 8.75                               | 870.35                           | 45.0                    | 35.0                   | 10                   | SAPROLITE      |
| MWOS4S      | 3/14/2023 | 878.60                       | DRY                                | DRY                              | 16.0                    | 6.0                    | 10                   | SAPROLITE      |
| MWBR1       | 3/14/2023 | 903.60                       | 16.70                              | 886.90                           | 85.0                    | 65.0                   | 20                   | BEDROCK        |
| MWBR5       | 3/14/2023 | 903.10                       | 16.23                              | 886.87                           | 109.0                   | 85.0                   | OPEN                 | BEDROCK        |

**Notes:**

- 1) bgs = below ground surface
- 2) in = inches
- 3) ft = feet
- 4) N/A = Not Available
- 5) NGVD = National Geodetic Vertical Datum
- 6) NM = Not Measured
- 7) PWR = Partially Weathered Rock

Prepared by/Date: MPL/02-18-2024  
Checked by/Date: JMB/02-29-2024

**TABLE 6-5: SUMMARY OF HYDRAULIC CONDUCTIVITY DATA -- SLUG TEST METHOD**  
**Bonnell Aluminum, Inc., Newnan, Georgia**  
**PCC Permit Renewal Application, 2024**

| WELL NO.       | TEST INTERVAL (FEET) | MATERIAL TESTED   | % FINES <sup>1</sup> | COEFFICIENT OF HYDRAULIC CONDUCTIVITY (K <sup>2</sup> ) (FEET/MINUTE) |
|----------------|----------------------|-------------------|----------------------|-----------------------------------------------------------------------|
| 9D             | 37.8 - 47.8          | sand <sup>3</sup> | 25.8                 | 3.4 X 10 <sup>-3</sup>                                                |
| 9S             | 3.2 - 13.0           | sand              | N/A <sup>4</sup>     | 3.4 X 10 <sup>-3</sup>                                                |
| 12D            | 27.7 - 37.7          | sand <sup>3</sup> | 20.8                 | 5.0 X 10 <sup>-4</sup>                                                |
| 12S            | 2.5 - 12.5           | sand <sup>3</sup> | 22.6                 | 3.0 X 10 <sup>-3</sup>                                                |
| 13S            | 15.0 - 25.0          | sand              | N/A <sup>4</sup>     | 1.8 X 10 <sup>-3</sup>                                                |
| 15D            | 39.0 - 49.0          | sand <sup>3</sup> | 17.8                 | 2.0 X 10 <sup>-4</sup>                                                |
| 15S            | 9.7 - 19.7           | sand              | N/A <sup>4</sup>     | 5.3 X 10 <sup>-3</sup>                                                |
| 21D            | 30.2 - 40.2          | sand              | N/A <sup>4</sup>     | 6.4 X 10 <sup>-4</sup>                                                |
| 21S            | 4.9 - 14.9           | sand              | N/A <sup>4</sup>     | 1.9 X 10 <sup>-3</sup>                                                |
| 27D            | 18.8 - 28.8          | sand              | N/A <sup>4</sup>     | 7.5 X 10 <sup>-4</sup>                                                |
| Geometric Mean |                      |                   |                      | 8.9 X 10 <sup>-4</sup>                                                |

1. Calculated using Bouwer and Rice Method.
2. Percent of soil sample passing a #200 sieve (i.e., clay and silt).
3. Grain size analyses performed on soil samples collected from the test interval of the well.
4. N/A = not analyzed.
5. Data source: 2014 PCC Permit Renewal Application.

Prepared by/Date: MPI/02-18-2024  
Checked by/Date: JMB/02-29-2024

**TABLE 6-6: SUMMARY OF HYDRAULIC CONDUCTIVITY -- PACKER TEST METHOD**  
**Bonnell Aluminum, Inc., Newnan, Georgia**  
**PCC Permit Renewal Application, 2024**

| BORING | TEST INTERVAL DEPTH (FT) | GAUGE PRESSURE (PSI) | COEFFICIENT OF HYDRAULIC CONDUCTIVITY (CM/SEC) | COEFFICIENT OF HYDRAULIC CONDUCTIVITY (FT/MIN) |
|--------|--------------------------|----------------------|------------------------------------------------|------------------------------------------------|
| C-1    | 26.5 - 39.1              | 5                    | $<1 \times 10^{-7}$                            | $<2 \times 10^{-7}$                            |
|        |                          | 10                   | $<1 \times 10^{-7}$                            | $<2 \times 10^{-7}$                            |
|        |                          | 15                   | $<1 \times 10^{-7}$                            | $<2 \times 10^{-7}$                            |
|        | 35.5 - 48.1              | 10                   | $<1 \times 10^{-7}$                            | $<2 \times 10^{-7}$                            |
|        |                          | 15                   | $<1 \times 10^{-7}$                            | $<2 \times 10^{-7}$                            |
|        |                          | 20                   | $<1 \times 10^{-7}$                            | $<2 \times 10^{-7}$                            |
|        | 48.1 - 60.7              | 10                   | $<1 \times 10^{-7}$                            | $<2 \times 10^{-7}$                            |
|        |                          | 20                   | $1.2 \times 10^{-5}$                           | $2.4 \times 10^{-5}$                           |
|        |                          | 30                   | $1.6 \times 10^{-4}$                           | $3.2 \times 10^{-4}$                           |
|        | 60.7 - 73.3              | 15                   | $3.6 \times 10^{-4}$                           | $7.1 \times 10^{-4}$                           |
| C-2    |                          | 25                   | $7.8 \times 10^{-4}$                           | $1.5 \times 10^{-3}$                           |
|        |                          | 35                   | $7.2 \times 10^{-4}$                           | $1.4 \times 10^{-3}$                           |
|        | 97.8 - 110.4             | 15                   | $6.9 \times 10^{-4}$                           | $1.4 \times 10^{-3}$                           |
|        |                          | 35                   | $5.8 \times 10^{-4}$                           | $1.1 \times 10^{-3}$                           |
|        |                          | 55                   | $5.1 \times 10^{-4}$                           | $1.0 \times 10^{-3}$                           |
|        | 106.4 - 119.0            | 20                   | $7.9 \times 10^{-4}$                           | $1.6 \times 10^{-3}$                           |
|        |                          | 40                   | $6.8 \times 10^{-4}$                           | $1.3 \times 10^{-3}$                           |
|        |                          | 25                   | $3.6 \times 10^{-5}$                           | $7.1 \times 10^{-5}$                           |
|        |                          | 45                   | $3.6 \times 10^{-5}$                           | $7.1 \times 10^{-5}$                           |
|        |                          | 65                   | $3.2 \times 10^{-5}$                           | $6.3 \times 10^{-5}$                           |
| C-3    | 80.5 - 93.1              | 25                   | $<1 \times 10^{-7}$                            | $<2 \times 10^{-7}$                            |
|        |                          | 35                   | $<1 \times 10^{-7}$                            | $<2 \times 10^{-7}$                            |
|        |                          | 45                   | $1.1 \times 10^{-6}$                           | $2.2 \times 10^{-6}$                           |
|        | 85.2 - 97.8              | 25                   | $<1 \times 10^{-7}$                            | $<2 \times 10^{-7}$                            |
|        |                          | 35                   | $<1 \times 10^{-7}$                            | $<2 \times 10^{-7}$                            |
|        |                          | 45                   | $<1 \times 10^{-7}$                            | $<2 \times 10^{-7}$                            |
|        | 97.8 - 110.4             | 25                   | $<1 \times 10^{-7}$                            | $<2 \times 10^{-7}$                            |
|        |                          | 40                   | $<1 \times 10^{-7}$                            | $<2 \times 10^{-7}$                            |
|        |                          | 55                   | $<1 \times 10^{-7}$                            | $<2 \times 10^{-7}$                            |
|        | 110.4 - 123.0            | 25                   | $<1 \times 10^{-7}$                            | $<2 \times 10^{-7}$                            |
|        |                          |                      | <b>Geometric Mean</b>                          | <b><math>9.0 \times 10^{-6}</math></b>         |

Note:

1. Data source: 2014 PCC Permit Renewal Application.

Prepared by/Date: MPL/02-18-2024  
Checked by/Date: JMB/02-29-2024

**TABLE 7-1: ABSTRACT HISTORY OF GROUNDWATER INVESTIGATIONS**  
**Bonnell Aluminum, Inc., Newnan, Georgia**  
**PCC Permit Renewal Application, 2024**

| DOCUMENT TITLE/<br>PREPARED BY:                                                                             | DATE ON COVER                               | DOCUMENT PURPOSE                                                                                                                                                                                                                                                                                                                      | CONCLUSIONS OR CONTENT                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|-------------------------------------------------------------------------------------------------------------|---------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <u>Groundwater Assessment Report for Volatile Organic Compounds</u> by Special Environmental Services (SES) | October 26, 1990,<br>revised March 14, 1991 | To evaluate source and extent of low levels of Perchloroethene (PCE) and Trichloroethene (TCE) discovered in groundwater onsite.                                                                                                                                                                                                      | Solvent released from Solid Waste Management Unit (SWMU) 49, a degreasing unit operated in the 1950's, was the sole source of VOCs in groundwater; that there are no other active releases of VOCs at the time of the report; and, that vertical downward migration of VOCs is naturally controlled by the top of the competent bedrock.                                                                                                                                                                                                                                                                                                       |
| <u>Assessment of Potential Sources of Release of Volatile Organic Compounds</u> , by SES                    | July, 1991                                  | In response to a letter from EPD, suggesting that the polishing pond and settling pond, both in use onsite at that time, may be sources of VOCs, since the water in the ponds contained VOCs.                                                                                                                                         | The degreasing operation (SWMU 49) is the only source of VOC contamination in groundwater; and that the settling and polishing ponds are not sources of VOC contamination. Includes design recommendations for a series of nine recovery wells to remediate contaminated groundwater. Includes recommendations to contain contaminated spring issuing from hillside behind the plant. The spring collection system is now known as the Hillside Spring/Low Point Connector. By June 1992, a total of 88 Type II groundwater monitoring wells had been installed at the facility.                                                               |
| <u>RCRA Facility Assessment</u> by EPD                                                                      | September 1991                              | Preliminary phase of RCRA corrective action program with objective to clean up releases to the environment of hazardous waste or hazardous constituents. The program applies to all operating, inactive, or closed facilities that treat, store or dispose of hazardous waste and which are thereby required to obtain a RCRA permit. | A list of each SWMU and what is known about any releases at the site.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| <u>Groundwater Assessment and Corrective Action Plan. Volatile Organic Compounds in Groundwater</u> by SES  | August, 1991                                | A revision to <u>Groundwater Assessment Report for Volatile Organic Compounds</u> , submitted March 1991. It includes additional information gathered during the Assessment study submitted in July 1991.                                                                                                                             | This report reinforces conclusions presented in <u>Groundwater Assessment Report for Volatile Organic Compounds</u> , July 1991, and introduces new data particularly in the area of groundwater modeling performed. Includes a more detailed Corrective Action Plan involving recovery wells.                                                                                                                                                                                                                                                                                                                                                 |
| <u>RCRA Part B Permit Application for Post-Closure Care</u> prepared by Law Environmental                   | 1992                                        | To assemble and organize all environmental data available for the site, in compliance with 40 CFR Part 264 facility permitting requirements.                                                                                                                                                                                          | Section A: Part A Permit Application<br>Section B: Facility description<br>Section C: Waste Characterization<br>Section E: Groundwater monitoring<br>Section I: Closure and Post Closure Care Plans for CrOH Landfill, CrOH Sludge Sand Drying Beds & Surface Impoundment Unit, ALOH Land Treatment Unit, and Tank Farm Unit<br>Section K: Certification Statement<br>Section L: Description of SWMUs at the Bon L facility, releases at the facility, and sampling and analytical data collected in verification of all SWMUs and AOCs.<br>Sections D,F,G, H do not apply to this facility and Section J lists laws that don't apply as well. |
| Post Closure Care Permit HW-087(D) issued by Georgia EPD                                                    | April, 1992                                 | Defines operating conditions at the Newnan Facility                                                                                                                                                                                                                                                                                   | Permittee must comply with the Georgia Hazardous Waste Management Act and the Rules for Hazardous Waste Management, Chapter 391-3-11, including certain portions of the Federal Hazardous Waste Regulations 40 CFR 260-279 and 124.                                                                                                                                                                                                                                                                                                                                                                                                            |
| <u>Bedrock Groundwater Investigation Report</u> , By EMCON Southeast, Inc.                                  | November 1992,<br>Revised April 1993        | To complete the horizontal and vertical definition of the plume of VOC contamination through the installation and sampling of six bedrock monitoring wells on or near the facility.                                                                                                                                                   | PCE occurs in the uppermost portions of the bedrock and partially weathered rock in the mid-sections of the contaminant plume, in the areas of wells BR-1, BR-4, BR-5, and BR-3. The report also concludes that mineral Springs Branch acts as a hydrogeologic boundary in both the saprolite and bedrock.                                                                                                                                                                                                                                                                                                                                     |

**TABLE 7-1: ABSTRACT HISTORY OF GROUNDWATER INVESTIGATIONS**  
**Bonnell Aluminum, Inc., Newnan, Georgia**  
**PCC Permit Renewal Application, 2024**

| DOCUMENT TITLE/<br>PREPARED BY:                                                                                         | DATE ON COVER                   | DOCUMENT PURPOSE                                                                                                                                                                                                                                                                           | CONCLUSIONS OR CONTENT                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|-------------------------------------------------------------------------------------------------------------------------|---------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <u>Stage I PCE/TCE Source Area Investigation Report at the William L Bonnell Company, Inc.</u> By EMCON Southeast, Inc. | January, 1993                   | To more accurately define the source of groundwater contamination suspected to emanate from the area of SWMU 49.                                                                                                                                                                           | Accurately delineated the location and layout of the former vapor degreasing unit (SWMU 49) discussed in 1991; strengthened the earlier conclusion that the degreasing unit was the sole source of VOC contamination; eliminated other suspected sources known at the time; and concluded that rapid remediation of the contamination associated with the closed degreasing unit would be highly advisable.                                                                                                                                                                                          |
| <u>Feasibility &amp; Corrective Action Plan</u> , by EMCON Southeast, Atlanta SE, Revised by Thomas W Watson, Inc.      | March 1993                      | Outlines the steps required to meet the clean-up objectives for corrective action of groundwater stated in 40 CFR 264.100 (a) using acceptable engineering methods. It address the releases known from the HWMU as well as those SWMUs known to have contributed to the VOC plume on site. | Section 1: A brief site background<br>Section 2: Summary of Monitoring well construction<br>Section 3: Aquifer and well testing<br>Section 4: Groundwater modeling and draw-down analysis<br>Section 5: Corrective action discussing various remediation alternatives. Operation and maintenance, monitoring criteria, remediation plans, termination criteria, schedule of implementation, and financial assurance requirements.                                                                                                                                                                    |
| <u>RCRA Facility Investigation Workplan</u> by EMCON Southeast, Inc.                                                    | December 1993                   | Site Characterization activities required under the Part B Permit                                                                                                                                                                                                                          | A summary of waste in each SWMU and known release at the site and approximate location of each. The technical approach of the remediation of each SWMU is given.                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| <u>RCRA Facility Investigation Report</u> by EMCON Southeast, Inc.                                                      | July 1994                       | Required by Sect IV of HW-087 permit dated 9/28/92, amended 9/28/93 to show the nature and extent of releases                                                                                                                                                                              | For SWMUs, a description is given, constituents of concern listed, sampling purposes, methodology and results are given, nature and extent of contamination is described, risk is listed, and recommendations are made for certain SWMU's.                                                                                                                                                                                                                                                                                                                                                           |
| <u>PCE Degreaser Corrective Action Plan and Vapor Extraction System Design Report</u> , by EMCON SE                     | November, 1994                  | To initiate remediation of SWMU 49                                                                                                                                                                                                                                                         | Further delineates the location of the former degreasing unit; determines that no significant sources of solvent or sludge were found below the containment structure of the former degreasing area; describes the installation and operation of a soil vapor extraction system (SVE), and describes recommended SVE shutdown criteria.                                                                                                                                                                                                                                                              |
| <u>Solid Waste Management Units 7 and 46 Bioremediation System Pilot Test Report</u> prepared by Thomas W. Watson, Inc. | May 1997.                       | To evaluate the potential for remediation of soil and groundwater affected by a solvent spill related to the Tank Farm Unit.                                                                                                                                                               | That in-situ bioremediation of the site was appropriate. Provided design recommendations for the system. Construction was completed in December, 1997. System operations began in January 1998. As-built drawings of the system, and monitoring reports were submitted to EPD in Semi-Annual Groundwater Monitoring and Remediation Report, March, 1998. since installation, the system has operated continuously. Soil and groundwater contamination attributable to the former tank farm unit has been greatly reduced in the interim.                                                             |
| <u>Closure and Post-Closure Care Plan for the Tank Farm Unit</u> prepared by Thomas W. Watson, Inc.                     | May 1997.                       | To close the Tank Farm Unit, no longer in use.                                                                                                                                                                                                                                             | The report describes closure of a 5,000-gallon waste solvent accumulation tank (SWMU 7), and a 10,000-gallon tank formerly used to store virgin toluene and xylenes (SWMU 46). The report combines SWMUs 7 and 46 into a regulated unit called the Tank Farm Unit (TFU). The Closure and Post Closure Care Plan was approved by EPD in September 30, 1997. Based upon the closure and post-closure care plan approved by EPD, Zimmerman Technical Services, Inc. designed a system for the in-situ bioremediation of soils affected by a solvent spill related to the Tank Farm Unit (SWMUs 7 & 46). |
| <u>Tank Farm Unit Closure Certification</u> , by Thomas W. Watson, Inc.                                                 | Submitted to EPD in July, 1998. | Certify that the Tank Farm Unit was closed according to the plan approved by EPD on September 30, 1997.                                                                                                                                                                                    | The document certifies that the unit was closed in accordance with the Closure Plan for the unit as approved by EPD on September 30, 1997. The document further certifies that a surveyed plat of the property has been filed with Coweta County, and with the City of Newnan, GA, per requirements of 40 CFR, Part 264.116.                                                                                                                                                                                                                                                                         |



**TABLE 7-1: ABSTRACT HISTORY OF GROUNDWATER INVESTIGATIONS**  
**Bonnell Aluminum, Inc., Newnan, Georgia**  
**PCC Permit Renewal Application, 2024**

| DOCUMENT TITLE/<br>PREPARED BY:                                                                                                      | DATE ON COVER                                                                                                   | DOCUMENT PURPOSE                                                                                                                                                                         | CONCLUSIONS OR CONTENT                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|--------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <u>Final Closure Procedures, Former PCE/TCE Degreasing Unit, Solid Waste Management Unit 49</u> , prepared by Thomas W. Watson, Inc. | November 1998. A revised version was resubmitted to EPD in January 2000, following system shutdown and removal. | To determine the effectiveness of the SVE system, and follow through with system shutdown, if appropriate.                                                                               | Data collected in 1997 thru 1998 concluded that: the SVE system had remediated soil contamination below the documented target level; groundwater in the area had been remediated; and that levels of VOCs in soil vapors recovered by the SVE system, plotted vs. time, had become asymptotic. The report recommended that the system be shut down and removed.                                                                                                                                               |
| <u>RCRA Part B Permit Application for Post-Closure Care</u> prepared by Law Environmental                                            | August 2003                                                                                                     | Permit had expired                                                                                                                                                                       | Renewed in 2004                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| <u>Site Permit HW-087(D)</u> issued by Georgia EPD                                                                                   | April 2004                                                                                                      | Renewal of permit.                                                                                                                                                                       | Permit In Place                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| <u>Assessment of In-Situ Remediation Technologies, Interim Report</u> . Prepared by TWSquared.                                       | April 2007                                                                                                      | Interim Status Report to be submitted to Georgia EPD.                                                                                                                                    | To initiate injection testing of permanganate and EHC at specified locations on property.                                                                                                                                                                                                                                                                                                                                                                                                                     |
| <u>Class 3 Permit Modification Request</u> Prepared by Bon L Manufacturing and TWSquared.                                            | July 2007                                                                                                       | To add 1,1-dichloroethane , and vinyl chloride to certain tables, to install two new monitoring wells; and to revise the Weekly Groundwater Recovery Well And Treatment System Checklist | Permit Issued                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| <u>Pilot Test Report</u> by TWSquared                                                                                                | June 19, 2009                                                                                                   | Benchmark as of cover date.                                                                                                                                                              | Permanganate injections are effective. Distribution of the solution may require numerous injection points. Effects of EHC less definitive. Adopt sodium permanganate rather than potassium permanganate.                                                                                                                                                                                                                                                                                                      |
| <u>Groundwater Assessment and Remediation, Bon L Manufacturing Company, Main Plant Building</u> Prepared by TWSquared                | May 2010                                                                                                        | Report of investigation to document plume assessment as of cover date.                                                                                                                   | The plume extent has been documented to the point that groundwater remediation can be implemented.                                                                                                                                                                                                                                                                                                                                                                                                            |
| <u>Permit Modification Request</u> prepared by TWSquared                                                                             | December 11, 2012                                                                                               | Request for modifications to existing site permit.                                                                                                                                       | Contents include: Request to add In-Situ Chemical Oxidation (ISCO) to Remediation Plan; Addendum to Site Feasibility and Corrective Action Plan describing plan for ISCO; requests to modify sampling and analytical plan to concentrate on monitoring of groundwater remediation and include less frequent sampling of specific wells; request to extend interval of App IX monitoring from annual to every 4 years; request to abandon specific wells.                                                      |
| <u>Revision 3 to the October 11, 2012 Class 3 Permit Modification Request</u> prepared by Bon L Manufacturing, TWSquared, and EPS    | August 14, 2013                                                                                                 | Request for modifications to existing site permit.                                                                                                                                       | Contents include: request to add In-Situ Chemical Oxidation (ISCO) to remedial approach including a CAP describing planned ISCO; request permanent closure of several monitoring wells; request to revise monitoring parameters based on upon source of contamination; request to change frequency of sampling for monitoring wells; request to change frequency of sampling for App. IX in POC wells; request to modify purging and sampling procedures; and to request to revise certain permit conditions. |
| <u>Post Closure Care Permit Renewal Application</u> prepared by Bon L Manufacturing, TWSquared, and EPS                              | October 16, 2013                                                                                                | Request for PCC Permit Renewal                                                                                                                                                           | Updating the 2003 PCC Permit Renewal Application including revisions to Section E and the Feasibility and CAP in accordance with Revision 3 to the October 11, 2012 Class 3 Permit Modification Request and the subsequent draft revised PCC Permit, which was presented for public comment in September 2013.                                                                                                                                                                                                |
| <u>Post Closure Care Permit Renewal Application Revision 1</u> prepared by Bon L Manufacturing and EPS                               | June 19, 2014                                                                                                   | Request for PCC Permit Renewal                                                                                                                                                           | Revision of the October 2013 PCC Permit Renewal Application requesting minor changes to the December 2013 Revised PCC Permit.                                                                                                                                                                                                                                                                                                                                                                                 |

**TABLE 7-1: ABSTRACT HISTORY OF GROUNDWATER INVESTIGATIONS**  
**Bonnell Aluminum, Inc., Newnan, Georgia**  
**PCC Permit Renewal Application, 2024**

| DOCUMENT TITLE/<br>PREPARED BY:                                                                               | DATE ON COVER                                               | DOCUMENT PURPOSE                                                                                                                                                                       | CONCLUSIONS OR CONTENT                                                                                                                                                                                                 |
|---------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <u>Post Closure Care Permit Renewal Application</u><br>Revision 2 prepared by Bon L Manufacturing and EPS     | August 4, 2014                                              | Request for PCC Permit Renewal                                                                                                                                                         | Revision of the October 2013 PCC Permit Renewal Application requesting minor changes to the December 2013 Revised PCC Permit.                                                                                          |
| <u>Site Permit HW-087(D)</u><br>issued by Georgia EPD                                                         | September 29, 2014                                          | Renewal of permit.                                                                                                                                                                     | Permit In Place                                                                                                                                                                                                        |
| <u>Groundwater Risk Assessment</u> prepared by Bon L Manufacturing and Amec Foster Wheeler                    | March 11, 2016                                              | Baseline risk assessment and calculated remedial goal options to aid design of the groundwater remedy and the long-term groundwater monitoring program at the facility.                | Evaluation for occupational and residential receptors (though site will remain as industrial land use). Groundwater land use control recommended and monitoring goals were developed.                                  |
| <u>RCRA/NPDES Compliance Strategy Report</u> prepared by Bon L Manufacturing and Amec Foster Wheeler          | January 17, 2017                                            | Prepared to present a strategy to eliminate NPDES discharge of treated groundwater and industrial wastewater while maintaining effective corrective action under PCC permit HW-087(D). | Recommended overall strategy to eliminate NPDES discharge and will prepare an Interim Corrective Measure work plan to perform the required modifications.                                                              |
| <u>Request for Temporary Authorization</u> prepared by Bon L Manufacturing and Amec Foster Wheeler            | October 20, 2017                                            | Prepared to present a strategy to initiate the implementation of the updated SWMU 49 CAP ahead of the upcoming RCRA Part B Permit Modification.                                        | Provided updated strategy to address the SWMU 49 PCE plume including temporary shutdown of the groundwater treatment system and implementation of ISBR in the downgradient portion of the SWMU 49 PCE plume.           |
| <u>SWMU 49 Corrective Action Plan</u> prepared by Bon L Manufacturing and Amec Foster Wheeler                 | October 20, 2017                                            | Revise SWMU 49 Corrective Action strategy.                                                                                                                                             | Revise corrective action strategy to discontinue groundwater extraction and ex-situ treatment and implement an in-situ strategy including chemical oxidation and bioremediation.                                       |
| <u>Class 3 Permit Modification Request, Post Closure Care Permit</u> prepared by Bon L Manufacturing and Wood | 5/7/2018,<br>revised September 14,<br>and December 18, 2018 | Prepared to modify the existing Post Closure Care Permit                                                                                                                               | Modify Permit to, among other requests, incorporate the Remedial Goal Options as Groundwater Protection Standards contained in the March 11, 2016 (Revised June 30, 2016) Groundwater Risk Assessment into the Permit. |
| <u>Site Permit HW-087(D)</u><br>issued by Georgia EPD                                                         | April 19, 2019                                              | Modified Permit to enhance monitoring and corrective action of contaminated groundwater at facility.                                                                                   | Modified Permit conditions for post-closure care and corrective action for five closed hazardous waste management units.                                                                                               |

PREPARED BY/DATE: AWE/03-06-2020  
CHECKED BY/DATE: MPL/03-06-2020

**TABLE 7-2: GROUNDWATER MONITORING PROGRAM UNDER 2019 PCC PERMIT**  
**Bonnell Aluminum, Inc., Newnan, Georgia**  
**PCC Permit Renewal Application, 2024**

| Unit                            | Background Well | POC Wells                                 | Annual Analysis | Semi-Annual Analysis                                                                                         |
|---------------------------------|-----------------|-------------------------------------------|-----------------|--------------------------------------------------------------------------------------------------------------|
| AIOH Land Treatment Unit        | MW13S           | MW42S<br>MW43S<br>MW44D<br>MW44S<br>MW45S | Appendix IX     | PCE, TCE, cis-1,2-DCE, 1,1-DCE, vinyl chloride, chromium* and nickel*, ethyl benzene, toluene, total xylenes |
| CrOH Landfill                   | MW13S           | MW4SR<br>MW17D<br>MW19S                   | Appendix IX     |                                                                                                              |
| Hazardous Waste Management Area | MW13S           | MW2SR<br>MW48S<br>MW49S<br>MW50S          | Appendix IX     |                                                                                                              |
| Tank Farm Unit                  | MW13S           | MW51S<br>MW52S                            | Appendix IX     | Toluene, ethylbenzene, total xylenes, PCE and TCE                                                            |

Note:

\* - Chromium and nickel sampled for at select POC wells on an annual basis.

Prepared by/Date: MPL/02-18-2024

Checked by/Date: JMB/02-29-2024

**TABLE 7-3: 2019 PERMIT TABLES I, II, III AND IV**  
**Bonnell Aluminum, Inc., Newnan, Georgia**  
**PCC Permit Renewal Application, 2024**

**2019 PERMIT TABLE I: GROUNDWATER PROTECTION STANDARD**

**AIOH Land Treatment Unit, CrOH Landfill, and Hazardous Waste Management Area (CrOH Sand Drying Bed and Surface Impoundment Unit) - Interior Monitoring Wells**

| HAZARDOUS CONSTITUENTS  | CONCENTRATION LIMITS (mg/l) |
|-------------------------|-----------------------------|
| <b>VOCs</b>             |                             |
| tetrachloroethene (PCE) | 0.31                        |
| trichloroethene (TCE)   | 0.014                       |
| cis-1,2-dichloroethene  | 0.16                        |
| vinyl chloride          | 0.002                       |

**2019 PERMIT TABLE II: GROUNDWATER PROTECTION STANDARD**

**AIOH Land Treatment Unit, CrOH Landfill, and Hazardous Waste Management Area (CrOH Sand Drying Bed and Surface Impoundment Unit) - Perimeter Monitoring Wells**

| HAZARDOUS CONSTITUENTS       | CONCENTRATION LIMITS (mg/l) |
|------------------------------|-----------------------------|
| <b>VOCs</b>                  |                             |
| tetrachloroethene (PCE)      | 0.005                       |
| trichloroethene (TCE)        | 0.005                       |
| cis-1,2-dichloroethene       | 0.07                        |
| vinyl chloride               | 0.002                       |
| 1,1-dichloroethene (1,1-DCE) | 0.007                       |

**2019 PERMIT TABLE III: GROUNDWATER PROTECTION STANDARD**

**Tank Farm Unit - Perimeter Monitoring Wells**

| HAZARDOUS CONSTITUENTS  | CONCENTRATION LIMITS (mg/l) |
|-------------------------|-----------------------------|
| <b>VOCs</b>             |                             |
| ethylbenzene            | 0.002                       |
| tetrachloroethene (PCE) | 0.005                       |
| toluene                 | 0.002                       |
| trichloroethene (TCE)   | 0.005                       |
| total xylene            | 0.005                       |

**2019 PERMIT TABLE IV: GROUNDWATER PROTECTION STANDARD**

**Special Conditions Wells**  
**(MW2SR, MW17D, MW42S, and MW45S)**

| HAZARDOUS CONSTITUENTS | CONCENTRATION LIMITS (mg/L) |
|------------------------|-----------------------------|
| <b>Metals</b>          |                             |
| chromium               | 0.05                        |
| nickel                 | 0.02                        |

Prepared by/Date: MPL/02-18-2024  
Checked by/Date: JMB/02-29-2024

**TABLE 7-4: 2019 PERMIT TABLE V, MONITORING WELL SAMPLING AND ANALYSIS**  
**Bonnell Aluminum, Inc., Newnan, Georgia**  
**PCC Permit Renewal Application, 2024**

| MONITORING WELL | SAMPLING FREQUENCY |                   | MAINTENANCE ONLY | APPENDIX IX | TABLE I | TABLE II | TABLE III | TABLE IV |
|-----------------|--------------------|-------------------|------------------|-------------|---------|----------|-----------|----------|
|                 | Annual Basis       | Semi-Annual Basis |                  |             |         |          |           |          |
| MW13S           |                    | X                 |                  | X           |         | X        | X         |          |
| *MW2SR          |                    | X                 |                  | X           | X       |          |           | X        |
| MW4SR           |                    | X                 |                  | X           | X       |          |           |          |
| *MW17D          |                    | X                 |                  | X           |         | X        |           | X        |
| MW19S           |                    | X                 |                  | X           | X       |          |           |          |
| MW42S           | X                  |                   |                  | X           |         |          |           | X        |
| MW43S           |                    |                   |                  | X           |         |          |           |          |
| MW44D           |                    |                   |                  | X           |         |          |           |          |
| MW44S           |                    |                   |                  | X           |         |          |           |          |
| MW45S           | X                  |                   |                  | X           |         |          |           | X        |
| MW48S           |                    |                   |                  | X           |         |          |           |          |
| MW49S           |                    | X                 |                  | X           | X       |          |           |          |
| MW50S           |                    | X                 |                  | X           | X       |          |           |          |
| MW51S           |                    | X                 |                  | X           |         |          | X         |          |
| MW52S           |                    | X                 |                  | X           |         |          | X         |          |
| MW28D           |                    | X                 |                  |             | X       |          |           |          |
| MW2DR           | X                  |                   |                  |             | X       |          |           |          |
| MW7D            | X                  |                   |                  |             | X       |          |           |          |
| MW19D           |                    | X                 |                  |             | X       |          |           |          |
| MW20D           | X                  |                   |                  |             |         | X        |           |          |
| MW21D           | X                  |                   |                  |             |         | X        |           |          |
| MW24D           | X                  |                   |                  |             |         | X        |           |          |
| MW27S           |                    | X                 |                  |             | X       |          |           |          |
| MW31D           |                    | X                 |                  |             | X       |          |           |          |
| MW32S           |                    | X                 |                  |             | X       |          |           |          |
| MW36D           | X                  |                   |                  |             |         | X        |           |          |
| MW37D           | X                  |                   |                  |             |         | X        |           |          |
| MW39D           | X                  |                   |                  |             |         | X        |           |          |
| MW40D           |                    | X                 |                  |             | X       |          |           |          |
| MW54S           | X                  |                   |                  |             | X       |          |           |          |
| MWOS1S          |                    | X                 |                  |             |         | X        |           |          |
| MWOS3D          |                    | X                 |                  |             | X       |          |           |          |
| MWOS5D          |                    | X                 |                  |             |         | X        |           |          |
| MWOS6D          |                    | X                 |                  |             |         | X        |           |          |
| MWOS7D          | X                  |                   |                  |             |         | X        |           |          |
| MWOS8D          | X                  |                   |                  |             |         | X        |           |          |
| MWBR3           | X                  |                   |                  |             | X       |          |           |          |
| MWBR6           | X                  |                   |                  |             |         | X        |           |          |
| MW18D           |                    |                   | X                |             |         |          |           |          |
| MW18S           |                    |                   | X                |             |         |          |           |          |
| MW20S           |                    |                   | X                |             |         |          |           |          |
| MW26D           |                    |                   | X                |             |         |          |           |          |
| MW26S           |                    |                   | X                |             |         |          |           |          |
| MW27D           |                    |                   | X                |             |         |          |           |          |
| MW28S           |                    |                   | X                |             |         |          |           |          |
| MW32D           |                    |                   | X                |             |         |          |           |          |
| MW35D           |                    |                   | X                |             |         |          |           |          |
| MW36S           |                    |                   | X                |             |         |          |           |          |
| MW41D           |                    |                   | X                |             |         |          |           |          |
| MW53S           |                    |                   | X                |             |         |          |           |          |
| MW73S           |                    |                   | X                |             |         |          |           |          |
| MW75S           |                    |                   | X                |             |         |          |           |          |
| MW76D           |                    |                   | X                |             |         |          |           |          |
| MW76S           |                    |                   | X                |             |         |          |           |          |
| MW77D           |                    |                   | X                |             |         |          |           |          |
| MW77S           |                    |                   | X                |             |         |          |           |          |
| MW78S           |                    |                   | X                |             |         |          |           |          |
| MW79S           |                    |                   | X                |             |         |          |           |          |
| MW80S           |                    |                   | X                |             |         |          |           |          |
| MW81S           |                    |                   | X                |             |         |          |           |          |

**TABLE 7-4: 2019 PERMIT TABLE V, MONITORING WELL SAMPLING AND ANALYSIS**  
**Bonnell Aluminum, Inc., Newnan, Georgia**  
**PCC Permit Renewal Application, 2024**

| MONITORING WELL | SAMPLING FREQUENCY |                   | MAINTENANCE ONLY | APPENDIX IX | TABLE I | TABLE II | TABLE III | TABLE IV |
|-----------------|--------------------|-------------------|------------------|-------------|---------|----------|-----------|----------|
|                 | Annual Basis       | Semi-Annual Basis |                  |             |         |          |           |          |
| MW82D           |                    |                   | X                |             |         |          |           |          |
| MW82S           |                    |                   | X                |             |         |          |           |          |
| MW83D           |                    |                   | X                |             |         |          |           |          |
| MW83S           |                    |                   | X                |             |         |          |           |          |
| MW85D           |                    |                   | X                |             |         |          |           |          |
| MW86D           |                    |                   | X                |             |         |          |           |          |
| MW87D           |                    |                   | X                |             |         |          |           |          |
| MW88D           |                    |                   | X                |             |         |          |           |          |
| MW89D           |                    |                   | X                |             |         |          |           |          |
| MW90D           |                    |                   | X                |             |         |          |           |          |
| MW91D           |                    |                   | X                |             |         |          |           |          |
| MW92D           |                    |                   | X                |             |         |          |           |          |
| MW93D           |                    |                   | X                |             |         |          |           |          |
| MWOS1D          |                    |                   | X                |             |         |          |           |          |
| MWOS2D          |                    |                   | X                |             |         |          |           |          |
| MWOS2S          |                    |                   | X                |             |         |          |           |          |
| MWOS3S          |                    |                   | X                |             |         |          |           |          |
| MWOS4D          |                    |                   | X                |             |         |          |           |          |
| MWOS4S          |                    |                   | X                |             |         |          |           |          |
| MWBR1           |                    |                   | X                |             |         |          |           |          |
| MWBR5           |                    |                   | X                |             |         |          |           |          |

Note:

- \* Table IV - Constituents for metals will be sampled annually for the following monitoring wells:  
MW2SR, MW17D, MW42S and MW45S.

Prepared by/Date: MPL/02-18-2024  
Checked by/Date: JMB/02-29-2024

**TABLE 7-5: RECENT GROUNDWATER METAL RESULTS**  
**Bonnell Aluminum, Inc., Newnan, Georgia**  
**PCC Permit Renewal Application, 2024**

| Well              | Date      | Chromium<br>(mg/L) | Nickel<br>(mg/L) | Arsenic<br>(mg/L) | Zinc<br>(mg/L) | Barium<br>(mg/L) |
|-------------------|-----------|--------------------|------------------|-------------------|----------------|------------------|
| <b>GWPS</b>       |           | <b>0.05</b>        | <b>0.02</b>      | <b>0.02</b>       | <b>0.05</b>    | <b>1</b>         |
| <b>AIOH LTU</b>   |           |                    |                  |                   |                |                  |
| <b>Maximum</b>    |           | <b>BDL</b>         | <b>BDL</b>       | <b>BDL</b>        | <b>BDL</b>     | <b>28.5</b>      |
| MW42S             | 3/22/2021 | BDL                | BDL              | NA                | NA             | NA               |
| MW42S             | 4/18/2022 | BDL                | BDL              | BDL               | BDL            | 28.5             |
| MW42S             | 3/17/2023 | BDL                | BDL              | NA                | NA             | NA               |
| MW43S             | 3/25/2021 | BDL                | BDL              | BDL               | BDL            | 21.0             |
| MW44S             | 3/16/2021 | BDL                | BDL              | BDL               | BDL            | 17.3             |
| MW44D             | 3/15/2023 | BDL                | BDL              | BDL               | BDL            | 27.6             |
| MW45S             | 3/25/2021 | BDL                | BDL              | BDL               | BDL            | 19.7             |
| MW45S             | 4/14/2022 | BDL                | BDL              | NA                | NA             | NA               |
| MW45S             | 3/17/2023 | BDL                | BDL              | NA                | NA             | NA               |
| <b>TFU</b>        |           |                    |                  |                   |                |                  |
| <b>Maximum</b>    |           | <b>BDL</b>         | <b>BDL</b>       | <b>37.8</b>       | <b>BDL</b>     | <b>71.0</b>      |
| MW51S             | 4/19/2022 | BDL                | BDL              | BDL               | BDL            | 71.0             |
| MW52S             | 3/19/2021 | BDL                | BDL              | 22.2              | BDL            | 45.5             |
| MW52S             | 3/15/2023 | BDL                | BDL              | 35.5              | BDL            | 37.4             |
| MW52S             | 9/21/2022 | NA                 | NA               | 37.8              | NA             | NA               |
| MW52S             | 9/19/2023 | NA                 | NA               | 37.6              | NA             | NA               |
| <b>CrOH LF</b>    |           |                    |                  |                   |                |                  |
| <b>Maximum</b>    |           | <b>BDL</b>         | <b>BDL</b>       | <b>BDL</b>        | <b>BDL</b>     | <b>97.6</b>      |
| MW4SR             | 3/23/2021 | BDL                | BDL              | BDL               | BDL            | 97.6             |
| MW4SR             | 4/14/2022 | BDL                | BDL              | BDL               | BDL            | 45.6             |
| MW17D             | 3/23/2021 | BDL                | BDL              | NA                | NA             | NA               |
| MW17D             | 4/13/2022 | BDL                | BDL              | NA                | NA             | NA               |
| MW17D             | 3/14/2023 | BDL                | BDL              | BDL               | BDL            | 60.4             |
| <b>HWMA</b>       |           |                    |                  |                   |                |                  |
| <b>Maximum</b>    |           | <b>BDL</b>         | <b>BDL</b>       | <b>BDL</b>        | <b>BDL</b>     | <b>61.8</b>      |
| MW2SR             | 3/25/2021 | BDL                | BDL              | BDL               | BDL            | 22.3             |
| MW2SR             | 4/13/2022 | BDL                | BDL              | NA                | NA             | NA               |
| MW2SR             | 3/17/2023 | BDL                | BDL              | NA                | NA             | NA               |
| MW48S             | 4/18/2022 | BDL                | BDL              | BDL               | BDL            | 15.6             |
| MW49S             | 3/15/2023 | BDL                | BDL              | BDL               | BDL            | 12.0             |
| MW50S             | 3/18/2021 | BDL                | BDL              | BDL               | BDL            | 61.8             |
| <b>Background</b> |           |                    |                  |                   |                |                  |
| <b>Maximum</b>    |           | <b>BDL</b>         | <b>BDL</b>       | <b>BDL</b>        | <b>84.0</b>    | <b>77.2</b>      |
| MW13S             | 3/18/2021 | BDL                | BDL              | BDL               | 80.4           | 74.2             |
| MW13S             | 4/20/2022 | BDL                | BDL              | BDL               | 80.9           | 77.2             |
| MW13S             | 3/17/2023 | BDL                | BDL              | BDL               | 84.0           | 72.9             |

BDL = Below Detection Limit

Prepared by/Date: MPL/02-18-2024  
Checked by/Date: JMB/03-05-2024

**TABLE 7-6: RECENT TOLUENE, ETHYLBENZENE AND TOTAL XYLENES RESULTS**  
**Bonnell Aluminum, Inc., Newnan, Georgia**  
**PCC Permit Renewal Application, 2024**

| Well                            | Date      | Toluene<br>µg/L | Ethylbenzene<br>µg/L | Xylenes, Total<br>µg/L |
|---------------------------------|-----------|-----------------|----------------------|------------------------|
| <b>Tank Farm Unit POC Wells</b> |           |                 |                      |                        |
| <b>GWPS</b>                     |           | <b>2</b>        | <b>2</b>             | <b>5</b>               |
| <b>Maximum</b>                  |           | <b>4.4</b>      | <b>49.8</b>          | <b>47.3</b>            |
| MW51S                           | 3/17/2021 | BDL             | <b>22.2</b>          | BDL                    |
| MW51S                           | 9/28/2021 | BDL             | <b>3.55</b>          | BDL                    |
| MW51S                           | 4/19/2022 | <b>4.4</b>      | <b>49.8</b>          | <b>47.3</b>            |
| MW51S                           | 9/22/2022 | BDL             | <b>9.1</b>           | <b>6.9</b>             |
| MW51S                           | 3/20/2023 | BDL             | <b>5.5</b>           | BDL                    |
| MW51S                           | 9/19/2023 | BDL             | BDL                  | BDL                    |
| MW52S                           | 3/22/2021 | BDL             | BDL                  | BDL                    |
| MW52S                           | 9/28/2021 | BDL             | BDL                  | BDL                    |
| MW52S                           | 4/14/2022 | BDL             | BDL                  | BDL                    |
| MW52S                           | 9/21/2022 | BDL             | BDL                  | <b>11.6</b>            |
| MW52S                           | 3/15/2023 | BDL             | BDL                  | BDL                    |
| MW52S                           | 9/19/2023 | BDL             | BDL                  | BDL                    |
| <b>Background</b>               |           |                 |                      |                        |
| MW13S                           | 3/22/2021 | BDL             | BDL                  | BDL                    |
| MW13S                           | 9/28/2021 | BDL             | BDL                  | BDL                    |
| MW13S                           | 4/20/2022 | BDL             | BDL                  | BDL                    |
| MW13S                           | 9/21/2022 | BDL             | BDL                  | BDL                    |
| MW13S                           | 3/17/2023 | BDL             | BDL                  | BDL                    |
| MW13S                           | 9/21/2023 | BDL             | BDL                  | BDL                    |

BDL = Below Detection Limit  
NA = Not Analyzed

Prepared by/Date: MPL/02-18-2024  
Checked by/Date: JMB/03-04-2024



**TABLE 7-7: RECENT PCE PLUME CONSTITUENTS RESULTS**  
**Bonnell Aluminum, Inc., Newnan, Georgia**  
**PCC Permit Renewal Application, 2024**

| LOCATION                          | DATE       | Tetrachloro-<br>ethylene<br>µg/L | Trichloro-<br>ethylene<br>µg/L | cis-1,2-<br>Dichloroethylene<br>µg/L | Vinyl chloride<br>µg/L | 1,1-<br>Dichloroethene<br>µg/L |
|-----------------------------------|------------|----------------------------------|--------------------------------|--------------------------------------|------------------------|--------------------------------|
| <b>PCE Plume Definition Wells</b> |            |                                  |                                |                                      |                        |                                |
| <b>Maximum</b>                    |            | <b>65.7</b>                      | <b>4.5</b>                     | <b>BDL</b>                           | <b>BDL</b>             | <b>BDL</b>                     |
| MW2DR                             | 3/17/2021  | 4.0                              | BDL                            | BDL                                  | BDL                    | NA                             |
| MW2DR                             | 4/13/2022  | 5.5                              | BDL                            | BDL                                  | BDL                    | NA                             |
| MW2DR                             | 3/20/2023  | 5.9                              | BDL                            | BDL                                  | BDL                    | NA                             |
| MW2DR                             | 3/25/2024  | 13.3                             | BDL                            | BDL                                  | BDL                    | NA                             |
| MW7D                              | 3/17/2021  | BDL                              | BDL                            | BDL                                  | BDL                    | NA                             |
| MW7D                              | 4/14/2022  | BDL                              | BDL                            | BDL                                  | BDL                    | NA                             |
| MW7D                              | 3/20/2023  | BDL                              | BDL                            | BDL                                  | BDL                    | NA                             |
| MW7D                              | 3/25/2024  | BDL                              | BDL                            | BDL                                  | BDL                    | NA                             |
| MW19D                             | 3/17/2021  | 37.1                             | BDL                            | BDL                                  | BDL                    | NA                             |
| MW19D                             | 9/28/2021  | 42.4                             | BDL                            | BDL                                  | BDL                    | NA                             |
| MW19D                             | 4/14/2022  | 32.7                             | BDL                            | BDL                                  | BDL                    | NA                             |
| MW19D                             | 9/22/2022  | 32.1                             | BDL                            | BDL                                  | BDL                    | NA                             |
| MW19D                             | 3/20/2023  | 27.8                             | BDL                            | BDL                                  | BDL                    | NA                             |
| MW19D                             | 9/20/2023  | 34.0                             | BDL                            | BDL                                  | BDL                    | NA                             |
| MW19D                             | 3/25/2024  | 33.9                             | BDL                            | BDL                                  | BDL                    | NA                             |
| MW19D                             | 10/23/2024 | 28.8                             | BDL                            | BDL                                  | BDL                    | NA                             |
| MW20D                             | 3/16/2021  | 2.0                              | BDL                            | BDL                                  | BDL                    | BDL                            |
| MW20D                             | 4/20/2022  | BDL                              | BDL                            | BDL                                  | BDL                    | BDL                            |
| MW20D                             | 3/14/2023  | BDL                              | BDL                            | BDL                                  | BDL                    | BDL                            |
| MW20D                             | 3/20/2024  | 2.9                              | BDL                            | BDL                                  | BDL                    | BDL                            |
| MW21D                             | 3/17/2021  | BDL                              | BDL                            | BDL                                  | BDL                    | BDL                            |
| MW21D                             | 4/14/2022  | BDL                              | BDL                            | BDL                                  | BDL                    | BDL                            |
| MW21D                             | 3/14/2023  | BDL                              | BDL                            | BDL                                  | BDL                    | BDL                            |
| MW21D                             | 3/22/2024  | BDL                              | BDL                            | BDL                                  | BDL                    | BDL                            |
| MW24D                             | 3/17/2021  | BDL                              | BDL                            | BDL                                  | BDL                    | BDL                            |
| MW24D                             | 4/12/2022  | BDL                              | BDL                            | BDL                                  | BDL                    | BDL                            |
| MW24D                             | 3/20/2023  | BDL                              | BDL                            | BDL                                  | BDL                    | BDL                            |
| MW24D                             | 3/22/2024  | BDL                              | BDL                            | BDL                                  | BDL                    | BDL                            |
| MW27D                             | 3/17/2021  | 41.3                             | BDL                            | BDL                                  | BDL                    | NA                             |
| MW27D                             | 9/28/2021  | 47.5                             | BDL                            | BDL                                  | BDL                    | NA                             |
| MW27D                             | 4/12/2022  | 40.7                             | BDL                            | BDL                                  | BDL                    | NA                             |
| MW27D                             | 9/20/2022  | 61.2                             | BDL                            | BDL                                  | BDL                    | NA                             |
| MW27D                             | 3/13/2023  | 52.9                             | BDL                            | BDL                                  | BDL                    | NA                             |
| MW27D                             | 9/18/2023  | 54.4                             | BDL                            | BDL                                  | BDL                    | NA                             |
| MW27D                             | 3/18/2024  | 65.7                             | BDL                            | BDL                                  | BDL                    | NA                             |
| MW27D                             | 10/22/2024 | 65.6                             | BDL                            | BDL                                  | BDL                    | NA                             |
| MW27S                             | 3/17/2021  | 35.9                             | BDL                            | BDL                                  | BDL                    | NA                             |
| MW27S                             | 9/28/2021  | 31.0                             | BDL                            | BDL                                  | BDL                    | NA                             |
| MW27S                             | 4/12/2022  | 29.1                             | BDL                            | BDL                                  | BDL                    | NA                             |
| MW27S                             | 9/21/2022  | 42.6                             | BDL                            | BDL                                  | BDL                    | NA                             |
| MW27S                             | 3/20/2023  | 35.3                             | BDL                            | BDL                                  | BDL                    | NA                             |
| MW27S                             | 9/19/2023  | 51.7                             | BDL                            | BDL                                  | BDL                    | NA                             |
| MW27S                             | 3/25/2024  | 58.2                             | BDL                            | BDL                                  | BDL                    | NA                             |
| MW27S                             | 10/22/2024 | 62.0                             | BDL                            | BDL                                  | BDL                    | NA                             |
| MW28S                             | 3/17/2021  | BDL                              | BDL                            | BDL                                  | BDL                    | NA                             |
| MW28S                             | 9/28/2021  | BDL                              | BDL                            | BDL                                  | BDL                    | NA                             |
| MW28S                             | 4/14/2022  | BDL                              | BDL                            | BDL                                  | BDL                    | NA                             |
| MW28S                             | 9/22/2022  | BDL                              | BDL                            | BDL                                  | BDL                    | NA                             |
| MW28S                             | 3/20/2023  | BDL                              | BDL                            | BDL                                  | BDL                    | NA                             |
| MW28S                             | 9/21/2023  | 6.8                              | 4.5                            | BDL                                  | BDL                    | NA                             |
| MW28S                             | 3/25/2024  | BDL                              | BDL                            | BDL                                  | BDL                    | NA                             |
| MW28S                             | 10/24/2024 | 4.8                              | BDL                            | BDL                                  | BDL                    | NA                             |
| MW31D                             | 3/18/2021  | 28.5                             | BDL                            | BDL                                  | BDL                    | NA                             |
| MW31D                             | 9/29/2021  | 40.1                             | BDL                            | BDL                                  | BDL                    | NA                             |
| MW31D                             | 4/19/2022  | 31.0                             | BDL                            | BDL                                  | BDL                    | NA                             |
| MW31D                             | 9/21/2022  | 27.0                             | BDL                            | BDL                                  | BDL                    | NA                             |

**TABLE 7-7: RECENT PCE PLUME CONSTITUENTS RESULTS**  
**Bonnell Aluminum, Inc., Newnan, Georgia**  
**PCC Permit Renewal Application, 2024**

| LOCATION | DATE       | Tetrachloro-<br>ethylene<br>µg/L | Trichloro-<br>ethylene<br>µg/L | cis-1,2-<br>Dichloroethylene<br>µg/L | Vinyl chloride<br>µg/L | 1,1-<br>Dichloroethene<br>µg/L |
|----------|------------|----------------------------------|--------------------------------|--------------------------------------|------------------------|--------------------------------|
| MW31D    | 3/16/2023  | 34.2                             | BDL                            | BDL                                  | BDL                    | NA                             |
| MW31D    | 9/20/2023  | 30.8                             | BDL                            | BDL                                  | BDL                    | NA                             |
| MW31D    | 3/20/2024  | 39.6                             | BDL                            | BDL                                  | BDL                    | NA                             |
| MW31D    | 10/24/2024 | 30.3                             | BDL                            | BDL                                  | BDL                    | NA                             |
| MW32S    | 3/17/2021  | 13.1                             | BDL                            | BDL                                  | BDL                    | NA                             |
| MW32S    | 9/29/2021  | 8.49                             | BDL                            | BDL                                  | BDL                    | NA                             |
| MW32S    | 4/14/2022  | 5.9                              | BDL                            | BDL                                  | BDL                    | NA                             |
| MW32S    | 9/21/2022  | 36.0                             | BDL                            | BDL                                  | BDL                    | NA                             |
| MW32S    | 3/20/2023  | 12.5                             | BDL                            | BDL                                  | BDL                    | NA                             |
| MW32S    | 9/20/2023  | 34.9                             | BDL                            | BDL                                  | BDL                    | NA                             |
| MW32S    | 3/25/2024  | 11.7                             | BDL                            | BDL                                  | BDL                    | NA                             |
| MW32S    | 10/23/2024 | 32.7                             | BDL                            | BDL                                  | BDL                    | NA                             |
| MW36D    | 3/17/2021  | BDL                              | BDL                            | BDL                                  | BDL                    | BDL                            |
| MW36D    | 4/14/2022  | BDL                              | BDL                            | BDL                                  | BDL                    | BDL                            |
| MW36D    | 3/20/2023  | BDL                              | BDL                            | BDL                                  | BDL                    | BDL                            |
| MW36D    | 3/20/2024  | BDL                              | BDL                            | BDL                                  | BDL                    | BDL                            |
| MW37D    | 3/17/2021  | BDL                              | BDL                            | BDL                                  | BDL                    | BDL                            |
| MW37D    | 4/14/2022  | BDL                              | BDL                            | BDL                                  | BDL                    | BDL                            |
| MW37D    | 3/20/2023  | BDL                              | BDL                            | BDL                                  | BDL                    | BDL                            |
| MW37D    | 3/20/2024  | BDL                              | BDL                            | BDL                                  | BDL                    | BDL                            |
| MW39D    | 3/17/2021  | 3.5                              | BDL                            | BDL                                  | BDL                    | BDL                            |
| MW39D    | 4/14/2022  | 2.7                              | BDL                            | BDL                                  | BDL                    | BDL                            |
| MW39D    | 3/20/2023  | 2.9                              | BDL                            | BDL                                  | BDL                    | BDL                            |
| MW39D    | 3/25/2024  | 3.4                              | BDL                            | BDL                                  | BDL                    | BDL                            |
| MW40D    | 3/16/2021  | 8.0                              | BDL                            | BDL                                  | BDL                    | NA                             |
| MW40D    | 9/27/2021  | 7.14                             | BDL                            | BDL                                  | BDL                    | NA                             |
| MW40D    | 4/11/2022  | 5.6                              | BDL                            | BDL                                  | BDL                    | NA                             |
| MW40D    | 9/19/2022  | 5.3                              | BDL                            | BDL                                  | BDL                    | NA                             |
| MW40D    | 3/13/2023  | 7.3                              | BDL                            | BDL                                  | BDL                    | NA                             |
| MW40D    | 9/18/2023  | 5.1                              | BDL                            | BDL                                  | BDL                    | NA                             |
| MW40D    | 3/18/2024  | 11.6                             | BDL                            | BDL                                  | BDL                    | NA                             |
| MW40D    | 10/24/2024 | 6.6                              | BDL                            | BDL                                  | BDL                    | NA                             |
| MW54S    | 3/17/2021  | BDL                              | BDL                            | BDL                                  | BDL                    | NA                             |
| MW54S    | 4/13/2022  | BDL                              | BDL                            | BDL                                  | BDL                    | NA                             |
| MW54S    | 3/20/2023  | BDL                              | BDL                            | BDL                                  | BDL                    | NA                             |
| MW54S    | 3/25/2024  | BDL                              | BDL                            | BDL                                  | BDL                    | NA                             |
| MWBR3    | 3/17/2021  | BDL                              | BDL                            | BDL                                  | BDL                    | NA                             |
| MWBR3    | 4/14/2022  | BDL                              | BDL                            | BDL                                  | BDL                    | NA                             |
| MWBR3    | 3/20/2023  | BDL                              | BDL                            | BDL                                  | BDL                    | NA                             |
| MWBR3    | 3/22/2024  | BDL                              | BDL                            | BDL                                  | BDL                    | NA                             |
| MWBR6    | 3/17/2021  | BDL                              | BDL                            | BDL                                  | BDL                    | BDL                            |
| MWBR6    | 4/14/2022  | BDL                              | BDL                            | BDL                                  | BDL                    | BDL                            |
| MWBR6    | 3/14/2023  | BDL                              | BDL                            | BDL                                  | BDL                    | BDL                            |
| MWBR6    | 3/22/2024  | BDL                              | BDL                            | BDL                                  | BDL                    | BDL                            |
| MWOS1S   | 3/19/2021  | BDL                              | BDL                            | BDL                                  | BDL                    | BDL                            |
| MWOS1S   | 9/28/2021  | BDL                              | BDL                            | BDL                                  | BDL                    | BDL                            |
| MWOS1S   | 4/18/2022  | BDL                              | BDL                            | BDL                                  | BDL                    | BDL                            |
| MWOS1S   | 9/22/2022  | BDL                              | BDL                            | BDL                                  | BDL                    | BDL                            |
| MWOS1S   | 3/16/2023  | BDL                              | BDL                            | BDL                                  | BDL                    | BDL                            |
| MWOS1S   | 9/20/2023  | BDL                              | BDL                            | BDL                                  | BDL                    | BDL                            |
| MWOS1S   | 3/21/2024  | BDL                              | BDL                            | BDL                                  | BDL                    | BDL                            |
| MWOS1S   | 10/23/2024 | BDL                              | BDL                            | BDL                                  | BDL                    | BDL                            |
| MWOS3D   | 3/18/2021  | 17.3                             | BDL                            | BDL                                  | BDL                    | NA                             |
| MWOS3D   | 9/28/2021  | 21.0                             | BDL                            | BDL                                  | BDL                    | NA                             |
| MWOS3D   | 4/18/2022  | 16.9                             | BDL                            | BDL                                  | BDL                    | NA                             |
| MWOS3D   | 9/22/2022  | 16.7                             | BDL                            | BDL                                  | BDL                    | NA                             |
| MWOS3D   | 3/16/2023  | 15.4                             | BDL                            | BDL                                  | BDL                    | NA                             |
| MWOS3D   | 9/20/2023  | 15.7                             | BDL                            | BDL                                  | BDL                    | NA                             |

**TABLE 7-7: RECENT PCE PLUME CONSTITUENTS RESULTS**  
**Bonnell Aluminum, Inc., Newnan, Georgia**  
**PCC Permit Renewal Application, 2024**

| LOCATION                               | DATE       | Tetrachloro-ethylene<br>µg/L | Trichloro-ethylene<br>µg/L | cis-1,2-Dichloroethylene<br>µg/L | Vinyl chloride<br>µg/L | 1,1-Dichloroethene<br>µg/L |
|----------------------------------------|------------|------------------------------|----------------------------|----------------------------------|------------------------|----------------------------|
| MWOS3D                                 | 3/20/2024  | 17.9                         | BDL                        | BDL                              | BDL                    | NA                         |
| MWOS3D                                 | 10/23/2024 | 16.6                         | BDL                        | BDL                              | BDL                    | NA                         |
| MWOS5D                                 | 3/17/2021  | BDL                          | BDL                        | BDL                              | BDL                    | BDL                        |
| MWOS5D                                 | 9/29/2021  | BDL                          | BDL                        | BDL                              | BDL                    | BDL                        |
| MWOS5D                                 | 4/14/2022  | BDL                          | BDL                        | BDL                              | BDL                    | BDL                        |
| MWOS5D                                 | 9/22/2022  | BDL                          | BDL                        | BDL                              | BDL                    | BDL                        |
| MWOS5D                                 | 3/14/2023  | BDL                          | BDL                        | BDL                              | BDL                    | BDL                        |
| MWOS5D                                 | 9/20/2023  | BDL                          | BDL                        | BDL                              | BDL                    | BDL                        |
| MWOS5D                                 | 3/22/2024  | BDL                          | BDL                        | BDL                              | BDL                    | BDL                        |
| MWOS5D                                 | 10/23/2024 | BDL                          | BDL                        | BDL                              | BDL                    | BDL                        |
| MWOS6D                                 | 3/19/2021  | BDL                          | BDL                        | BDL                              | BDL                    | BDL                        |
| MWOS6D                                 | 9/28/2021  | BDL                          | BDL                        | BDL                              | BDL                    | BDL                        |
| MWOS6D                                 | 4/19/2022  | BDL                          | BDL                        | BDL                              | BDL                    | BDL                        |
| MWOS6D                                 | 9/22/2022  | 2.1                          | BDL                        | BDL                              | BDL                    | BDL                        |
| MWOS6D                                 | 3/16/2023  | BDL                          | BDL                        | BDL                              | BDL                    | BDL                        |
| MWOS6D                                 | 9/20/2023  | 3.0                          | BDL                        | BDL                              | BDL                    | BDL                        |
| MWOS6D                                 | 3/22/2024  | BDL                          | BDL                        | BDL                              | BDL                    | BDL                        |
| MWOS6D                                 | 10/23/2024 | 2.8                          | BDL                        | BDL                              | BDL                    | BDL                        |
| MWOS7D                                 | 3/17/2021  | BDL                          | BDL                        | BDL                              | BDL                    | BDL                        |
| MWOS7D                                 | 4/14/2022  | BDL                          | BDL                        | BDL                              | BDL                    | BDL                        |
| MWOS7D                                 | 3/20/2023  | BDL                          | BDL                        | BDL                              | BDL                    | BDL                        |
| MWOS7D                                 | 3/22/2024  | BDL                          | BDL                        | BDL                              | BDL                    | BDL                        |
| MWOS8D                                 | 3/19/2021  | BDL                          | BDL                        | BDL                              | BDL                    | BDL                        |
| MWOS8D                                 | 4/19/2022  | BDL                          | BDL                        | BDL                              | BDL                    | BDL                        |
| MWOS8D                                 | 3/16/2023  | BDL                          | BDL                        | BDL                              | BDL                    | BDL                        |
| MWOS8D                                 | 3/21/2024  | BDL                          | BDL                        | BDL                              | BDL                    | BDL                        |
| <b>Wells in Reagent Injection Area</b> |            |                              |                            |                                  |                        |                            |
| <b>Maximum</b>                         |            | <b>21,800</b>                | <b>485</b>                 | <b>2,680</b>                     | <b>343</b>             | <b>NA</b>                  |
| MW26D                                  | 3/16/2021  | 9.0                          | BDL                        | 2.3                              | BDL                    | NA                         |
| MW26D                                  | 9/27/2021  | 6.12                         | BDL                        | 2.50                             | BDL                    | NA                         |
| MW26D                                  | 4/12/2022  | 5.6                          | BDL                        | 2.1                              | BDL                    | NA                         |
| MW26D                                  | 9/19/2022  | 5.3                          | BDL                        | 2.8                              | BDL                    | NA                         |
| MW26D                                  | 3/13/2023  | 7.2                          | BDL                        | 2.5                              | BDL                    | NA                         |
| MW26D                                  | 9/18/2023  | 4.0                          | BDL                        | 2.9                              | BDL                    | NA                         |
| MW26D                                  | 3/18/2024  | 4.8                          | BDL                        | 2.9                              | BDL                    | NA                         |
| MW26D                                  | 10/22/2024 | 3.9                          | BDL                        | 2.4                              | BDL                    | NA                         |
| MW41D                                  | 3/16/2021  | 2.6                          | BDL                        | BDL                              | BDL                    | NA                         |
| MW41D                                  | 9/27/2021  | 3.41                         | BDL                        | BDL                              | BDL                    | NA                         |
| MW41D                                  | 4/11/2022  | 2.1                          | BDL                        | BDL                              | BDL                    | NA                         |
| MW41D                                  | 9/19/2022  | 2.9                          | BDL                        | BDL                              | BDL                    | NA                         |
| MW41D                                  | 3/13/2023  | 2.6                          | BDL                        | BDL                              | BDL                    | NA                         |
| MW41D                                  | 9/18/2023  | 2.6                          | BDL                        | BDL                              | BDL                    | NA                         |
| MW41D                                  | 3/18/2024  | 2.1                          | BDL                        | BDL                              | BDL                    | NA                         |
| MW41D                                  | 10/21/2024 | BDL                          | BDL                        | BDL                              | BDL                    | NA                         |
| MW73S                                  | 3/16/2021  | BDL                          | BDL                        | BDL                              | BDL                    | NA                         |
| MW73S                                  | 9/27/2021  | BDL                          | BDL                        | BDL                              | BDL                    | NA                         |
| MW73S                                  | 4/11/2022  | BDL                          | BDL                        | BDL                              | BDL                    | NA                         |
| MW73S                                  | 9/19/2022  | BDL                          | BDL                        | BDL                              | BDL                    | NA                         |
| MW73S                                  | 3/13/2023  | BDL                          | BDL                        | BDL                              | BDL                    | NA                         |
| MW73S                                  | 9/18/2023  | BDL                          | BDL                        | BDL                              | BDL                    | NA                         |
| MW73S                                  | 3/18/2024  | BDL                          | BDL                        | BDL                              | BDL                    | NA                         |
| MW73S                                  | 10/21/2024 | BDL                          | BDL                        | BDL                              | BDL                    | NA                         |
| MW75S                                  | 3/16/2021  | 4,180                        | 183                        | 180                              | BDL                    | NA                         |
| MW75S                                  | 9/27/2021  | 5,220                        | BDL                        | BDL                              | BDL                    | NA                         |
| MW75S                                  | 4/12/2022  | 2,920                        | 135                        | 131                              | BDL                    | NA                         |
| MW75S                                  | 9/19/2022  | 3,860                        | 169                        | 167                              | BDL                    | NA                         |
| MW75S                                  | 3/13/2023  | 2,450                        | 116                        | 112                              | BDL                    | NA                         |
| MW75S                                  | 9/18/2023  | 2,150                        | 110                        | 114                              | BDL                    | NA                         |

**TABLE 7-7: RECENT PCE PLUME CONSTITUENTS RESULTS**  
**Bonnell Aluminum, Inc., Newnan, Georgia**  
**PCC Permit Renewal Application, 2024**

| LOCATION | DATE       | Tetrachloro-<br>ethylene<br>µg/L | Trichloro-<br>ethylene<br>µg/L | cis-1,2-<br>Dichloroethylene<br>µg/L | Vinyl chloride<br>µg/L | 1,1-<br>Dichloroethene<br>µg/L |
|----------|------------|----------------------------------|--------------------------------|--------------------------------------|------------------------|--------------------------------|
| MW75S    | 3/18/2024  | 2,400                            | 136                            | 139                                  | BDL                    | NA                             |
| MW75S    | 10/21/2024 | 1,840                            | 113                            | 96.8                                 | BDL                    | NA                             |
| MW76D    | 3/16/2021  | 22.9                             | BDL                            | BDL                                  | BDL                    | NA                             |
| MW76D    | 9/27/2021  | 41.6                             | BDL                            | BDL                                  | BDL                    | NA                             |
| MW76D    | 4/12/2022  | 37.2                             | BDL                            | BDL                                  | BDL                    | NA                             |
| MW76D    | 9/19/2022  | 41.9                             | BDL                            | BDL                                  | BDL                    | NA                             |
| MW76D    | 3/13/2023  | 77.4                             | BDL                            | BDL                                  | BDL                    | NA                             |
| MW76D    | 9/18/2023  | 128                              | 5.8                            | 2.8                                  | BDL                    | NA                             |
| MW76D    | 3/18/2024  | 195                              | 3.1                            | BDL                                  | BDL                    | NA                             |
| MW76D    | 10/21/2024 | 150                              | BDL                            | BDL                                  | BDL                    | NA                             |
| MW76S    | 3/16/2021  | 237                              | 164                            | 77                                   | 5.3                    | NA                             |
| MW76S    | 9/27/2021  | 207                              | 150                            | 77.9                                 | 5.59                   | NA                             |
| MW76S    | 4/12/2022  | 195                              | 134                            | 63.2                                 | BDL                    | NA                             |
| MW76S    | 9/19/2022  | 188                              | 64.8                           | 30.9                                 | BDL                    | NA                             |
| MW76S    | 3/13/2023  | 197                              | 30.6                           | 11.9                                 | BDL                    | NA                             |
| MW76S    | 9/18/2023  | 198                              | 47.7                           | 28.5                                 | BDL                    | NA                             |
| MW76S    | 3/18/2024  | 56.9                             | 2.3                            | 2.5                                  | BDL                    | NA                             |
| MW76S    | 10/21/2024 | 227                              | 49.2                           | 24.4                                 | BDL                    | NA                             |
| MW77S    | 3/16/2021  | 3,410                            | BDL                            | 179                                  | BDL                    | NA                             |
| MW77S    | 9/27/2021  | 21,800                           | BDL                            | 2,680                                | BDL                    | NA                             |
| MW77S    | 4/12/2022  | 3,320                            | BDL                            | 203                                  | BDL                    | NA                             |
| MW77S    | 9/19/2022  | 15,900                           | 313                            | 1,620                                | 263                    | NA                             |
| MW77S    | 3/13/2023  | 10,500                           | BDL                            | 338                                  | BDL                    | NA                             |
| MW77S    | 9/18/2023  | 19,300                           | 291                            | 1,720                                | 343                    | NA                             |
| MW77S    | 3/18/2024  | 5,810                            | 159                            | 740                                  | 159                    | NA                             |
| MW77S    | 10/21/2024 | 935                              | BDL                            | 177                                  | 166                    | NA                             |
| MW77D    | 3/16/2021  | 984                              | BDL                            | BDL                                  | BDL                    | NA                             |
| MW77D    | 9/27/2021  | 7,390                            | 81.1                           | 805                                  | BDL                    | NA                             |
| MW77D    | 4/12/2022  | 3,370                            | BDL                            | BDL                                  | BDL                    | NA                             |
| MW77D    | 9/19/2022  | 8,170                            | 108                            | 762                                  | 140                    | NA                             |
| MW77D    | 3/13/2023  | 13,100                           | BDL                            | 822                                  | BDL                    | NA                             |
| MW77D    | 9/18/2023  | 8,150                            | 139                            | 846                                  | 173                    | NA                             |
| MW77D    | 3/18/2024  | 19,800                           | 375                            | 1,360                                | BDL                    | NA                             |
| MW77D    | 10/21/2024 | 6,070                            | BDL                            | 366                                  | BDL                    | NA                             |
| MW78S    | 3/16/2021  | 202                              | BDL                            | BDL                                  | BDL                    | NA                             |
| MW78S    | 9/27/2021  | 322                              | BDL                            | BDL                                  | BDL                    | NA                             |
| MW78S    | 4/12/2022  | 166                              | 4.3                            | 3.8                                  | BDL                    | NA                             |
| MW78S    | 9/19/2022  | 466                              | 14.3                           | 13.9                                 | BDL                    | NA                             |
| MW78S    | 3/13/2023  | 314                              | 7.6                            | 6.1                                  | BDL                    | NA                             |
| MW78S    | 9/18/2023  | 1,160                            | 49.7                           | 48.2                                 | BDL                    | NA                             |
| MW78S    | 3/18/2024  | 500                              | 14.6                           | 12.3                                 | BDL                    | NA                             |
| MW78S    | 10/21/2024 | 1,230                            | 66.7                           | 48.3                                 | BDL                    | NA                             |
| MW79S    | 3/16/2021  | 64.8                             | 2.4                            | 2.1                                  | BDL                    | NA                             |
| MW79S    | 9/27/2021  | 62.0                             | 2.52                           | 2.41                                 | BDL                    | NA                             |
| MW79S    | 4/12/2022  | 50.1                             | 2.3                            | 2.4                                  | BDL                    | NA                             |
| MW79S    | 9/20/2022  | 53.5                             | 2.3                            | 2.4                                  | BDL                    | NA                             |
| MW79S    | 3/13/2023  | 58.2                             | 2.0                            | 2.1                                  | BDL                    | NA                             |
| MW79S    | 9/18/2023  | 55.4                             | 2.6                            | 3.1                                  | BDL                    | NA                             |
| MW79S    | 4/10/2024  | 44.4                             | 2.6                            | 2.4                                  | BDL                    | NA                             |
| MW79S    | 10/21/2024 | 53.0                             | 2.2                            | 2.2                                  | BDL                    | NA                             |
| MW80S    | 3/16/2021  | BDL                              | 285                            | 438                                  | 156                    | NA                             |
| MW80S    | 9/27/2021  | BDL                              | 186                            | 490                                  | 170                    | NA                             |
| MW80S    | 4/11/2022  | BDL                              | 69.7                           | 453                                  | 179                    | NA                             |
| MW80S    | 9/20/2022  | BDL                              | 95.5                           | 590                                  | 147                    | NA                             |
| MW80S    | 3/13/2023  | BDL                              | 36.9                           | 422                                  | 99.2                   | NA                             |
| MW80S    | 9/18/2023  | BDL                              | 75.8                           | 398                                  | 94.9                   | NA                             |
| MW80S    | 3/18/2024  | BDL                              | 91.7                           | 439                                  | 101                    | NA                             |
| MW80S    | 10/21/2024 | BDL                              | 6.9                            | 115                                  | 33.6                   | NA                             |

**TABLE 7-7: RECENT PCE PLUME CONSTITUENTS RESULTS**  
**Bonnell Aluminum, Inc., Newnan, Georgia**  
**PCC Permit Renewal Application, 2024**

| LOCATION | DATE       | Tetrachloro-<br>ethylene<br>µg/L | Trichloro-<br>ethylene<br>µg/L | cis-1,2-<br>Dichloroethylene<br>µg/L | Vinyl chloride<br>µg/L | 1,1-<br>Dichloroethene<br>µg/L |
|----------|------------|----------------------------------|--------------------------------|--------------------------------------|------------------------|--------------------------------|
| MW81S    | 3/16/2021  | 1400                             | 146                            | 206                                  | 72.4                   | NA                             |
| MW81S    | 9/27/2021  | 1,610                            | BDL                            | BDL                                  | BDL                    | NA                             |
| MW81S    | 4/11/2022  | 1,150                            | 247                            | 296                                  | 88.5                   | NA                             |
| MW81S    | 9/19/2022  | 1,010                            | 205                            | 218                                  | 75.6                   | NA                             |
| MW81S    | 3/13/2023  | 1,500                            | 455                            | 442                                  | 113                    | NA                             |
| MW81S    | 9/18/2023  | 887                              | 189                            | 219                                  | 83                     | NA                             |
| MW81S    | 3/18/2024  | 1,390                            | 485                            | 515                                  | 160                    | NA                             |
| MW81S    | 10/21/2024 | 226                              | BDL                            | BDL                                  | BDL                    | NA                             |
| MW82D    | 3/16/2021  | BDL                              | BDL                            | BDL                                  | BDL                    | NA                             |
| MW82D    | 9/27/2021  | BDL                              | BDL                            | BDL                                  | BDL                    | NA                             |
| MW82D    | 4/12/2022  | BDL                              | BDL                            | BDL                                  | BDL                    | NA                             |
| MW82D    | 9/19/2022  | BDL                              | BDL                            | BDL                                  | BDL                    | NA                             |
| MW82D    | 3/13/2023  | BDL                              | BDL                            | BDL                                  | BDL                    | NA                             |
| MW82D    | 9/18/2023  | BDL                              | BDL                            | BDL                                  | BDL                    | NA                             |
| MW82D    | 3/18/2024  | 3.4                              | BDL                            | BDL                                  | BDL                    | NA                             |
| MW82D    | 10/22/2024 | 10.4                             | BDL                            | BDL                                  | BDL                    | NA                             |
| MW82S    | 3/16/2021  | 24.9                             | 2.1                            | BDL                                  | BDL                    | NA                             |
| MW82S    | 9/27/2021  | 40.0                             | 3.05                           | 2.33                                 | BDL                    | NA                             |
| MW82S    | 4/12/2022  | 134                              | 7.3                            | 5.6                                  | BDL                    | NA                             |
| MW82S    | 9/19/2022  | 145                              | 5.7                            | 4.9                                  | BDL                    | NA                             |
| MW82S    | 3/13/2023  | 138                              | 6.9                            | 5.9                                  | BDL                    | NA                             |
| MW82S    | 9/18/2023  | 252                              | 8.8                            | 7.9                                  | BDL                    | NA                             |
| MW82S    | 3/18/2024  | 122                              | 4.1                            | 3.4                                  | BDL                    | NA                             |
| MW82S    | 10/22/2024 | 181                              | 9.6                            | 8.1                                  | BDL                    | NA                             |
| MW83S    | 3/16/2021  | 217                              | BDL                            | BDL                                  | BDL                    | NA                             |
| MW83S    | 9/27/2021  | 251                              | BDL                            | 3.12                                 | BDL                    | NA                             |
| MW83S    | 4/13/2022  | 174                              | BDL                            | BDL                                  | BDL                    | NA                             |
| MW83S    | 9/19/2022  | 186                              | BDL                            | BDL                                  | BDL                    | NA                             |
| MW83S    | 3/13/2023  | 189                              | BDL                            | BDL                                  | BDL                    | NA                             |
| MW83S    | 9/18/2023  | 193                              | BDL                            | BDL                                  | BDL                    | NA                             |
| MW83S    | 3/18/2024  | 227                              | BDL                            | BDL                                  | BDL                    | NA                             |
| MW83S    | 10/22/2024 | 156                              | BDL                            | BDL                                  | BDL                    | NA                             |
| MW83D    | 3/16/2021  | 106                              | BDL                            | BDL                                  | BDL                    | NA                             |
| MW83D    | 9/27/2021  | 177                              | BDL                            | BDL                                  | BDL                    | NA                             |
| MW83D    | 4/13/2022  | 108                              | BDL                            | BDL                                  | BDL                    | NA                             |
| MW83D    | 9/19/2022  | 131                              | BDL                            | BDL                                  | BDL                    | NA                             |
| MW83D    | 3/13/2023  | 115                              | BDL                            | BDL                                  | BDL                    | NA                             |
| MW83D    | 9/18/2023  | 161                              | BDL                            | BDL                                  | BDL                    | NA                             |
| MW83D    | 3/18/2024  | 167                              | BDL                            | BDL                                  | BDL                    | NA                             |
| MW83D    | 10/22/2024 | 126                              | BDL                            | BDL                                  | BDL                    | NA                             |
| MW85D    | 3/16/2021  | 12                               | BDL                            | BDL                                  | BDL                    | NA                             |
| MW85D    | 9/27/2021  | 909                              | 6.10                           | 6.41                                 | BDL                    | NA                             |
| MW85D    | 4/12/2022  | 2,690                            | BDL                            | BDL                                  | BDL                    | NA                             |
| MW85D    | 9/19/2022  | 5,340                            | BDL                            | BDL                                  | BDL                    | NA                             |
| MW85D    | 3/13/2023  | 8,670                            | BDL                            | BDL                                  | BDL                    | NA                             |
| MW85D    | 9/18/2023  | 9,190                            | BDL                            | 110                                  | BDL                    | NA                             |
| MW85D    | 3/18/2024  | 11,400                           | BDL                            | BDL                                  | BDL                    | NA                             |
| MW85D    | 10/22/2024 | 6,760                            | BDL                            | 105                                  | BDL                    | NA                             |
| MW86D    | 3/16/2021  | 198                              | BDL                            | BDL                                  | BDL                    | NA                             |
| MW86D    | 9/27/2021  | 198                              | 2.70                           | 2.43                                 | BDL                    | NA                             |
| MW86D    | 4/11/2022  | 166                              | BDL                            | BDL                                  | BDL                    | NA                             |
| MW86D    | 9/19/2022  | 247                              | BDL                            | BDL                                  | BDL                    | NA                             |
| MW86D    | 3/13/2023  | 331                              | 5.2                            | BDL                                  | BDL                    | NA                             |
| MW86D    | 9/18/2023  | 612                              | 11.5                           | BDL                                  | BDL                    | NA                             |
| MW86D    | 3/18/2024  | 39.3                             | BDL                            | 3.5                                  | BDL                    | NA                             |
| MW86D    | 10/21/2024 | 2,120                            | 50.2                           | 46.0                                 | BDL                    | NA                             |
| MW87D    | 3/16/2021  | 54.2                             | BDL                            | BDL                                  | BDL                    | NA                             |
| MW87D    | 9/27/2021  | 40.7                             | BDL                            | BDL                                  | BDL                    | NA                             |

**TABLE 7-7: RECENT PCE PLUME CONSTITUENTS RESULTS**  
**Bonnell Aluminum, Inc., Newnan, Georgia**  
**PCC Permit Renewal Application, 2024**

| LOCATION               | DATE       | Tetrachloro-ethylene<br>µg/L | Trichloro-ethylene<br>µg/L | cis-1,2-Dichloroethylene<br>µg/L | Vinyl chloride<br>µg/L | 1,1-Dichloroethene<br>µg/L |
|------------------------|------------|------------------------------|----------------------------|----------------------------------|------------------------|----------------------------|
| MW87D                  | 4/12/2022  | 78.2                         | BDL                        | BDL                              | BDL                    | NA                         |
| MW87D                  | 9/19/2022  | 54.0                         | BDL                        | BDL                              | BDL                    | NA                         |
| MW87D                  | 3/13/2023  | 331                          | 5.2                        | BDL                              | BDL                    | NA                         |
| MW87D                  | 9/18/2023  | 49.6                         | BDL                        | BDL                              | BDL                    | NA                         |
| MW87D                  | 3/18/2024  | 58.1                         | BDL                        | BDL                              | BDL                    | NA                         |
| MW87D                  | 10/21/2024 | 111.0                        | BDL                        | BDL                              | BDL                    | NA                         |
| MW88D                  | 3/16/2021  | 7,560                        | BDL                        | 166                              | BDL                    | NA                         |
| MW88D                  | 9/27/2021  | 12,900                       | BDL                        | BDL                              | BDL                    | NA                         |
| MW88D                  | 4/12/2022  | 11,200                       | BDL                        | 271                              | BDL                    | NA                         |
| MW88D                  | 9/19/2022  | 10,400                       | BDL                        | 403                              | BDL                    | NA                         |
| MW88D                  | 3/13/2023  | 16,700                       | BDL                        | 260                              | BDL                    | NA                         |
| MW88D                  | 9/18/2023  | 12,700                       | 309                        | 620                              | BDL                    | NA                         |
| MW88D                  | 3/18/2024  | 12,400                       | 266                        | 702                              | BDL                    | NA                         |
| MW88D                  | 10/21/2024 | 2,200                        | BDL                        | BDL                              | BDL                    | NA                         |
| MW89D                  | 3/16/2021  | 129                          | BDL                        | BDL                              | BDL                    | NA                         |
| MW89D                  | 9/27/2021  | 129                          | BDL                        | BDL                              | BDL                    | NA                         |
| MW89D                  | 4/12/2022  | 122                          | BDL                        | BDL                              | BDL                    | NA                         |
| MW89D                  | 9/19/2022  | 68.8                         | BDL                        | BDL                              | BDL                    | NA                         |
| MW89D                  | 3/13/2023  | 65.3                         | BDL                        | BDL                              | BDL                    | NA                         |
| MW89D                  | 9/18/2023  | 95.7                         | BDL                        | BDL                              | BDL                    | NA                         |
| MW89D                  | 3/18/2024  | 95.4                         | BDL                        | BDL                              | BDL                    | NA                         |
| MW89D                  | 10/21/2024 | 95.1                         | BDL                        | BDL                              | BDL                    | NA                         |
| RW14                   | 3/17/2021  | 340                          | BDL                        | BDL                              | BDL                    | NA                         |
| RW14                   | 9/27/2021  | 389                          | BDL                        | BDL                              | BDL                    | NA                         |
| RW14                   | 4/12/2022  | 305                          | BDL                        | BDL                              | BDL                    | NA                         |
| RW14                   | 9/20/2022  | 384                          | BDL                        | BDL                              | BDL                    | NA                         |
| RW14                   | 3/13/2023  | 320                          | BDL                        | BDL                              | BDL                    | NA                         |
| RW14                   | 9/18/2023  | 369                          | BDL                        | BDL                              | BDL                    | NA                         |
| RW14                   | 3/18/2024  | 307                          | BDL                        | BDL                              | BDL                    | NA                         |
| RW14                   | 10/22/2024 | 284                          | BDL                        | BDL                              | BDL                    | NA                         |
| RW15                   | 3/17/2021  | 49                           | BDL                        | BDL                              | BDL                    | NA                         |
| RW15                   | 9/27/2021  | 18.0                         | BDL                        | BDL                              | BDL                    | NA                         |
| RW15                   | 4/12/2022  | 14.7                         | BDL                        | BDL                              | BDL                    | NA                         |
| RW15                   | 9/20/2022  | 60.3                         | BDL                        | BDL                              | BDL                    | NA                         |
| RW15                   | 3/13/2023  | 54.0                         | BDL                        | BDL                              | BDL                    | NA                         |
| RW15                   | 9/18/2023  | 58.5                         | BDL                        | BDL                              | BDL                    | NA                         |
| RW15                   | 3/18/2024  | 68.6                         | BDL                        | BDL                              | BDL                    | NA                         |
| RW15                   | 10/22/2024 | 53.6                         | BDL                        | BDL                              | BDL                    | NA                         |
| <b>Hillside Spring</b> |            |                              |                            |                                  |                        |                            |
| Hillside Spring        | 9/19/2023  | 107                          | BDL                        | BDL                              | BDL                    | NA                         |
| Hillside Spring        | 3/18/2024  | 111                          | BDL                        | BDL                              | BDL                    | NA                         |
| Hillside Spring        | 10/22/2024 | 114                          | BDL                        | BDL                              | BDL                    | NA                         |
| <b>AIOH LTU</b>        |            |                              |                            |                                  |                        |                            |
| <b>GWPS</b>            |            | <b>2</b>                     | <b>2</b>                   |                                  | <b>5</b>               |                            |
| <b>Maximum</b>         |            | <b>BDL</b>                   | <b>BDL</b>                 | <b>BDL</b>                       | <b>BDL</b>             | <b>BDL</b>                 |
| MW42S                  | 4/18/2022  | BDL                          | BDL                        | BDL                              | BDL                    | BDL                        |
| MW43S                  | 3/25/2021  | BDL                          | BDL                        | BDL                              | BDL                    | BDL                        |
| MW44D                  | 3/15/2023  | BDL                          | BDL                        | BDL                              | BDL                    | BDL                        |
| MW44S                  | 3/16/2021  | BDL                          | BDL                        | BDL                              | BDL                    | BDL                        |
| MW45S                  | 3/21/2024  | BDL                          | BDL                        | BDL                              | BDL                    | BDL                        |
| <b>CrOH LF</b>         |            |                              |                            |                                  |                        |                            |
| <b>GWPS</b>            |            | <b>2</b>                     | <b>2</b>                   |                                  | <b>5</b>               |                            |
| <b>Maximum</b>         |            | <b>15.8</b>                  | <b>8.6</b>                 | <b>22.6</b>                      | <b>BDL</b>             | <b>BDL</b>                 |
| MW4SR                  | 3/25/2021  | BDL                          | BDL                        | 19.6                             | BDL                    | NA                         |
| MW4SR                  | 9/29/2021  | BDL                          | BDL                        | 21.4                             | BDL                    | NA                         |
| MW4SR                  | 4/14/2022  | BDL                          | BDL                        | 22.6                             | BDL                    | NA                         |
| MW4SR                  | 9/22/2022  | BDL                          | BDL                        | 18.3                             | BDL                    | NA                         |
| MW4SR                  | 3/15/2023  | 13.2                         | 3.7                        | 9.7                              | BDL                    | NA                         |

**TABLE 7-7: RECENT PCE PLUME CONSTITUENTS RESULTS**  
**Bonnell Aluminum, Inc., Newnan, Georgia**  
**PCC Permit Renewal Application, 2024**

| LOCATION       | DATE       | Tetrachloro-ethylene<br>µg/L | Trichloro-ethylene<br>µg/L | cis-1,2-Dichloroethylene<br>µg/L | Vinyl chloride<br>µg/L | 1,1-Dichloroethene<br>µg/L |
|----------------|------------|------------------------------|----------------------------|----------------------------------|------------------------|----------------------------|
| MW4SR          | 9/20/2023  | 15.8                         | 6.4                        | 3.8                              | BDL                    | NA                         |
| MW4SR          | 3/20/2024  | 15.6                         | 8.6                        | 3.4                              | BDL                    | NA                         |
| MW4SR          | 10/23/2024 | 5.8                          | 6.7                        | 5.9                              | BDL                    | NA                         |
| MW17D          | 3/23/2021  | 4.2                          | BDL                        | BDL                              | BDL                    | BDL                        |
| MW17D          | 9/29/2021  | 6.0                          | BDL                        | BDL                              | BDL                    | BDL                        |
| MW17D          | 4/13/2022  | 3.4                          | BDL                        | BDL                              | BDL                    | BDL                        |
| MW17D          | 9/21/2022  | 4.6                          | BDL                        | BDL                              | BDL                    | BDL                        |
| MW17D          | 3/14/2023  | 3.0                          | BDL                        | BDL                              | BDL                    | BDL                        |
| MW17D          | 9/20/2023  | 6.4                          | BDL                        | BDL                              | BDL                    | BDL                        |
| MW17D          | 3/19/2024  | 2.9                          | BDL                        | BDL                              | BDL                    | BDL                        |
| MW17D          | 10/23/2024 | 6.2                          | BDL                        | BDL                              | BDL                    | BDL                        |
| MW19S          | 3/25/2021  | BDL                          | BDL                        | BDL                              | BDL                    | NA                         |
| MW19S          | 9/30/2021  | BDL                          | BDL                        | BDL                              | BDL                    | NA                         |
| MW19S          | 4/19/2022  | BDL                          | BDL                        | BDL                              | BDL                    | NA                         |
| MW19S          | 9/22/2022  | BDL                          | BDL                        | BDL                              | BDL                    | NA                         |
| MW19S          | 3/16/2023  | BDL                          | BDL                        | BDL                              | BDL                    | NA                         |
| MW19S          | 9/20/2023  | BDL                          | BDL                        | BDL                              | BDL                    | NA                         |
| MW19S          | 3/19/2024  | BDL                          | BDL                        | BDL                              | BDL                    | NA                         |
| MW19S          | 10/24/2024 | BDL                          | BDL                        | BDL                              | BDL                    | NA                         |
| <b>HWMA</b>    |            |                              |                            |                                  |                        |                            |
| <b>GWPS</b>    |            | <b>2</b>                     | <b>2</b>                   |                                  | <b>5</b>               |                            |
| <b>Maximum</b> |            | <b>8.5</b>                   | <b>5.3</b>                 | <b>5.9</b>                       | <b>BDL</b>             | <b>BDL</b>                 |
| MW2SR          | 3/24/2021  | 5.8                          | BDL                        | BDL                              | BDL                    | NA                         |
| MW2SR          | 9/28/2021  | 4.22                         | BDL                        | BDL                              | BDL                    | NA                         |
| MW2SR          | 4/13/2022  | 4.5                          | BDL                        | BDL                              | BDL                    | NA                         |
| MW2SR          | 9/21/2022  | 7.7                          | BDL                        | BDL                              | BDL                    | NA                         |
| MW2SR          | 3/17/2023  | 7.3                          | BDL                        | BDL                              | BDL                    | NA                         |
| MW2SR          | 9/20/2023  | 7.8                          | BDL                        | BDL                              | BDL                    | NA                         |
| MW2SR          | 3/20/2024  | 8.1                          | BDL                        | BDL                              | BDL                    | NA                         |
| MW2SR          | 10/24/2024 | 8.5                          | BDL                        | BDL                              | BDL                    | NA                         |
| MW48S          | 4/18/2022  | BDL                          | BDL                        | 5.9                              | BDL                    | BDL                        |
| MW49S          | 3/17/2021  | BDL                          | BDL                        | 2.5                              | BDL                    | NA                         |
| MW49S          | 9/28/2021  | BDL                          | BDL                        | 2.15                             | BDL                    | NA                         |
| MW49S          | 4/13/2022  | BDL                          | BDL                        | 2.2                              | BDL                    | NA                         |
| MW49S          | 9/22/2022  | BDL                          | BDL                        | 2.0                              | BDL                    | NA                         |
| MW49S          | 3/15/2023  | BDL                          | BDL                        | BDL                              | BDL                    | NA                         |
| MW49S          | 9/20/2023  | BDL                          | BDL                        | 2.5                              | BDL                    | NA                         |
| MW49S          | 3/25/2024  | BDL                          | BDL                        | 2.1                              | BDL                    | NA                         |
| MW49S          | 10/24/2024 | BDL                          | BDL                        | 2.0                              | BDL                    | NA                         |
| MW50S          | 3/23/2021  | BDL                          | BDL                        | 5.9                              | BDL                    | NA                         |
| MW50S          | 9/28/2021  | BDL                          | BDL                        | 2.76                             | BDL                    | NA                         |
| MW50S          | 4/13/2022  | 5.7                          | 5.3                        | 4.9                              | BDL                    | NA                         |
| MW50S          | 9/22/2022  | BDL                          | BDL                        | 3.1                              | BDL                    | NA                         |
| MW50S          | 3/20/2023  | BDL                          | 2.8                        | 5.5                              | BDL                    | NA                         |
| MW50S          | 9/20/2023  | BDL                          | BDL                        | 2.9                              | BDL                    | NA                         |
| MW50S          | 3/25/2024  | BDL                          | BDL                        | 2.4                              | BDL                    | NA                         |
| MW50S          | 10/24/2024 | BDL                          | BDL                        | 2.2                              | BDL                    | NA                         |
| <b>TFU</b>     |            |                              |                            |                                  |                        |                            |
| <b>GWPS</b>    |            | <b>2</b>                     | <b>2</b>                   |                                  | <b>5</b>               |                            |
| <b>Maximum</b> |            | <b>BDL</b>                   | <b>7.9</b>                 | <b>NA</b>                        | <b>NA</b>              | <b>NA</b>                  |
| MW51S          | 3/17/2021  | BDL                          | 3.3                        | NA                               | NA                     | NA                         |
| MW51S          | 9/28/2021  | BDL                          | 3.85                       | NA                               | NA                     | NA                         |
| MW51S          | 4/19/2022  | BDL                          | BDL                        | NA                               | NA                     | NA                         |
| MW51S          | 9/22/2022  | BDL                          | 7.9                        | NA                               | NA                     | NA                         |
| MW51S          | 3/20/2023  | BDL                          | BDL                        | NA                               | NA                     | NA                         |
| MW51S          | 9/19/2023  | BDL                          | 6.3                        | NA                               | NA                     | NA                         |
| MW51S          | 3/20/2024  | BDL                          | BDL                        | NA                               | NA                     | NA                         |
| MW51S          | 10/23/2024 | BDL                          | BDL                        | NA                               | NA                     | NA                         |

**TABLE 7-7: RECENT PCE PLUME CONSTITUENTS RESULTS**  
**Bonnell Aluminum, Inc., Newnan, Georgia**  
**PCC Permit Renewal Application, 2024**

| LOCATION          | DATE       | Tetrachloro-ethylene<br>µg/L | Trichloro-ethylene<br>µg/L | cis-1,2-Dichloroethylene<br>µg/L | Vinyl chloride<br>µg/L | 1,1-Dichloroethene<br>µg/L |
|-------------------|------------|------------------------------|----------------------------|----------------------------------|------------------------|----------------------------|
| MW52S             | 3/22/2021  | BDL                          | BDL                        | NA                               | NA                     | NA                         |
| MW52S             | 9/28/2021  | BDL                          | BDL                        | NA                               | NA                     | NA                         |
| MW52S             | 4/14/2022  | BDL                          | BDL                        | NA                               | NA                     | NA                         |
| MW52S             | 9/21/2022  | BDL                          | BDL                        | NA                               | NA                     | NA                         |
| MW52S             | 3/15/2023  | BDL                          | BDL                        | NA                               | NA                     | NA                         |
| MW52S             | 9/19/2023  | BDL                          | BDL                        | NA                               | NA                     | NA                         |
| MW52S             | 3/25/2024  | BDL                          | BDL                        | NA                               | NA                     | NA                         |
| MW52S             | 10/24/2024 | BDL                          | BDL                        | NA                               | NA                     | NA                         |
| <b>Background</b> |            |                              |                            |                                  |                        |                            |
| MW13S             | 3/22/2021  | BDL                          | BDL                        | BDL                              | BDL                    | BDL                        |
| MW13S             | 9/28/2021  | BDL                          | BDL                        | BDL                              | BDL                    | BDL                        |
| MW13S             | 4/20/2022  | BDL                          | BDL                        | BDL                              | BDL                    | BDL                        |
| MW13S             | 9/21/2022  | BDL                          | BDL                        | BDL                              | BDL                    | BDL                        |
| MW13S             | 3/17/2023  | BDL                          | BDL                        | BDL                              | BDL                    | BDL                        |
| MW13S             | 9/21/2023  | BDL                          | BDL                        | BDL                              | BDL                    | BDL                        |
| MW13S             | 3/21/2024  | BDL                          | BDL                        | BDL                              | BDL                    | BDL                        |
| MW13S             | 10/23/2024 | BDL                          | BDL                        | BDL                              | BDL                    | BDL                        |

BDL = Below detection limit

NA = Not Analyzed

Prepared by/Date: JPB/02-19-2024

Checked by/Date: MPL/02-22-2024



**TABLE 7-8: RECENT SURFACE WATER RESULTS**  
**Bonnell Aluminum, Inc., Newnan, Georgia**  
**PCC Permit Renewal Application, 2024**

| SAMPLE LOCATION | DATE       | Tetrachloro-ethylene | Trichloro-ethylene | cis-1,2-Dichloroethylene | Vinyl chloride |
|-----------------|------------|----------------------|--------------------|--------------------------|----------------|
|                 |            | µg/L                 | µg/L               | µg/L                     | µg/L           |
| SW01            | 3/24/2021  | 30.0                 | BDL                | BDL                      | BDL            |
| SW01            | 9/30/2021  | 35.0                 | BDL                | BDL                      | BDL            |
| SW01            | 4/15/2022  | 30.0                 | BDL                | BDL                      | BDL            |
| SW01            | 9/22/2022  | 27.8                 | BDL                | BDL                      | BDL            |
| SW01            | 3/21/2023  | 32.4                 | BDL                | BDL                      | BDL            |
| SW01            | 9/21/2023  | 37.9                 | BDL                | BDL                      | BDL            |
| SW01            | 3/25/2024  | 45.2                 | BDL                | BDL                      | BDL            |
| SW01            | 10/25/2024 | 31.2                 | BDL                | BDL                      | BDL            |
| SW03            | 3/24/2021  | 11.8                 | BDL                | BDL                      | BDL            |
| SW03            | 9/30/2021  | 12.2                 | BDL                | BDL                      | BDL            |
| SW03            | 4/15/2022  | 14.4                 | BDL                | BDL                      | BDL            |
| SW03            | 9/22/2022  | 8.8                  | BDL                | BDL                      | BDL            |
| SW03            | 3/21/2023  | 9.4                  | BDL                | BDL                      | BDL            |
| SW03            | 9/21/2023  | 10.4                 | BDL                | BDL                      | BDL            |
| SW03            | 3/25/2024  | 16.1                 | BDL                | BDL                      | BDL            |
| SW03            | 10/25/2024 | 13.9                 | BDL                | BDL                      | BDL            |
| SW05            | 3/24/2021  | BDL                  | BDL                | BDL                      | BDL            |
| SW05            | 9/30/2021  | BDL                  | BDL                | BDL                      | BDL            |
| SW05            | 4/15/2022  | BDL                  | BDL                | BDL                      | BDL            |
| SW05            | 9/22/2022  | BDL                  | BDL                | BDL                      | BDL            |
| SW05            | 3/21/2023  | BDL                  | BDL                | BDL                      | BDL            |
| SW05            | 9/21/2023  | BDL                  | BDL                | BDL                      | BDL            |
| SW05            | 3/25/2024  | BDL                  | BDL                | BDL                      | BDL            |
| SW05            | 10/25/2024 | BDL                  | BDL                | BDL                      | BDL            |
| SW06            | 3/24/2021  | BDL                  | BDL                | BDL                      | BDL            |
| SW06            | 9/30/2021  | BDL                  | BDL                | BDL                      | BDL            |
| SW06            | 4/15/2022  | BDL                  | BDL                | BDL                      | BDL            |
| SW06            | 9/22/2022  | BDL                  | BDL                | BDL                      | BDL            |
| SW06            | 3/21/2023  | BDL                  | BDL                | BDL                      | BDL            |
| SW06            | 9/21/2023  | BDL                  | BDL                | BDL                      | BDL            |
| SW06            | 3/25/2024  | BDL                  | BDL                | BDL                      | BDL            |
| SW06            | 10/25/2024 | BDL                  | BDL                | BDL                      | BDL            |
| SW08            | 3/24/2021  | BDL                  | BDL                | BDL                      | BDL            |
| SW08            | 9/30/2021  | BDL                  | BDL                | BDL                      | BDL            |
| SW08            | 4/15/2022  | BDL                  | BDL                | BDL                      | BDL            |
| SW08            | 9/22/2022  | BDL                  | BDL                | BDL                      | BDL            |
| SW08            | 3/21/2023  | BDL                  | BDL                | BDL                      | BDL            |
| SW08            | 9/21/2023  | BDL                  | BDL                | BDL                      | BDL            |
| SW08            | 3/25/2024  | BDL                  | BDL                | BDL                      | BDL            |
| SW08            | 10/25/2024 | BDL                  | BDL                | BDL                      | BDL            |
| SW09            | 3/24/2021  | BDL                  | BDL                | BDL                      | BDL            |
| SW09            | 9/30/2021  | BDL                  | BDL                | BDL                      | BDL            |
| SW09            | 4/15/2022  | BDL                  | BDL                | BDL                      | BDL            |
| SW09            | 9/22/2022  | BDL                  | BDL                | BDL                      | BDL            |
| SW09            | 3/21/2023  | BDL                  | BDL                | BDL                      | BDL            |
| SW09            | 9/21/2023  | BDL                  | BDL                | BDL                      | BDL            |
| SW09            | 3/25/2024  | BDL                  | BDL                | BDL                      | BDL            |

**TABLE 7-8: RECENT SURFACE WATER RESULTS**  
**Bonnell Aluminum, Inc., Newnan, Georgia**  
**PCC Permit Renewal Application, 2024**

| SAMPLE LOCATION | DATE       | Tetrachloro-ethylene | Trichloro-ethylene | cis-1,2-Dichloroethylene | Vinyl chloride |
|-----------------|------------|----------------------|--------------------|--------------------------|----------------|
|                 |            | µg/L                 | µg/L               | µg/L                     | µg/L           |
| SW09            | 10/25/2024 | BDL                  | BDL                | BDL                      | BDL            |
| SW10            | 3/24/2021  | BDL                  | BDL                | BDL                      | BDL            |
| SW10            | 9/30/2021  | NS                   | NS                 | NS                       | NS             |
| SW10            | 4/15/2022  | BDL                  | BDL                | BDL                      | BDL            |
| SW10            | 9/22/2022  | BDL                  | BDL                | BDL                      | BDL            |
| SW10            | 3/21/2023  | BDL                  | BDL                | BDL                      | BDL            |
| SW10            | 9/21/2023  | BDL                  | BDL                | BDL                      | BDL            |
| SW10            | 3/25/2024  | BDL                  | BDL                | BDL                      | BDL            |
| SW10            | 10/25/2024 | BDL                  | BDL                | BDL                      | BDL            |
| SW11            | 3/24/2021  | BDL                  | BDL                | BDL                      | BDL            |
| SW11            | 9/30/2021  | BDL                  | BDL                | BDL                      | BDL            |
| SW11            | 4/15/2022  | BDL                  | BDL                | BDL                      | BDL            |
| SW11            | 9/22/2022  | BDL                  | BDL                | BDL                      | BDL            |
| SW11            | 3/21/2023  | BDL                  | BDL                | BDL                      | BDL            |
| SW11            | 9/21/2023  | BDL                  | BDL                | BDL                      | BDL            |
| SW11            | 3/25/2024  | BDL                  | BDL                | BDL                      | BDL            |
| SW11            | 10/25/2024 | BDL                  | BDL                | BDL                      | BDL            |
| SW12            | 3/24/2021  | BDL                  | BDL                | BDL                      | BDL            |
| SW12            | 9/30/2021  | BDL                  | BDL                | BDL                      | BDL            |
| SW12            | 4/15/2022  | BDL                  | BDL                | BDL                      | BDL            |
| SW12            | 9/22/2022  | BDL                  | BDL                | BDL                      | BDL            |
| SW12            | 3/21/2023  | BDL                  | BDL                | BDL                      | BDL            |
| SW12            | 9/21/2023  | BDL                  | BDL                | BDL                      | BDL            |
| SW12            | 3/25/2024  | BDL                  | BDL                | BDL                      | BDL            |
| SW12            | 10/25/2024 | BDL                  | BDL                | BDL                      | BDL            |
| SW13            | 3/24/2021  | BDL                  | BDL                | BDL                      | BDL            |
| SW13            | 9/30/2021  | BDL                  | BDL                | BDL                      | BDL            |
| SW13            | 4/15/2022  | BDL                  | BDL                | BDL                      | BDL            |
| SW13            | 9/22/2022  | BDL                  | BDL                | BDL                      | BDL            |
| SW13            | 3/21/2023  | BDL                  | BDL                | BDL                      | BDL            |
| SW13            | 9/21/2023  | BDL                  | BDL                | BDL                      | BDL            |
| SW13            | 3/25/2024  | BDL                  | BDL                | BDL                      | BDL            |
| SW13            | 10/25/2024 | BDL                  | BDL                | BDL                      | BDL            |
| SW14            | 3/24/2021  | BDL                  | BDL                | BDL                      | BDL            |
| SW14            | 9/30/2021  | BDL                  | BDL                | BDL                      | BDL            |
| SW14            | 4/15/2022  | BDL                  | BDL                | BDL                      | BDL            |
| SW14            | 9/22/2022  | BDL                  | BDL                | BDL                      | BDL            |
| SW14            | 3/21/2023  | 2.4                  | BDL                | BDL                      | BDL            |
| SW14            | 9/21/2023  | BDL                  | BDL                | BDL                      | BDL            |
| SW14            | 3/25/2024  | 2.3                  | BDL                | BDL                      | BDL            |
| SW14            | 10/25/2024 | 2.1                  | BDL                | BDL                      | BDL            |
| SW15            | 3/24/2021  | BDL                  | BDL                | BDL                      | BDL            |
| SW15            | 9/30/2021  | 2.1                  | BDL                | BDL                      | BDL            |
| SW15            | 4/15/2022  | 2.1                  | BDL                | BDL                      | BDL            |
| SW15            | 9/22/2022  | BDL                  | BDL                | BDL                      | BDL            |
| SW15            | 3/21/2023  | 2.8                  | BDL                | BDL                      | BDL            |
| SW15            | 9/21/2023  | BDL                  | BDL                | BDL                      | BDL            |

**TABLE 7-8: RECENT SURFACE WATER RESULTS**  
**Bonnell Aluminum, Inc., Newnan, Georgia**  
**PCC Permit Renewal Application, 2024**

| SAMPLE LOCATION | DATE       | Tetrachloro-ethylene | Trichloro-ethylene | cis-1,2-Dichloroethylene | Vinyl chloride |
|-----------------|------------|----------------------|--------------------|--------------------------|----------------|
|                 |            | µg/L                 | µg/L               | µg/L                     | µg/L           |
| SW15            | 3/25/2024  | 2.3                  | BDL                | BDL                      | BDL            |
| SW15            | 10/25/2024 | 2.4                  | BDL                | BDL                      | BDL            |
| SWPOND          | 3/24/2021  | BDL                  | BDL                | BDL                      | BDL            |
| SWPOND          | 9/30/2021  | BDL                  | BDL                | BDL                      | BDL            |
| SWPOND          | 4/15/2022  | BDL                  | BDL                | BDL                      | BDL            |
| SWPOND          | 9/22/2022  | BDL                  | BDL                | BDL                      | BDL            |
| SWPOND          | 3/21/2023  | BDL                  | BDL                | BDL                      | BDL            |
| SWPOND          | 9/21/2023  | BDL                  | BDL                | BDL                      | BDL            |
| SWPOND          | 3/25/2024  | BDL                  | BDL                | BDL                      | BDL            |
| SWPOND          | 10/25/2024 | BDL                  | BDL                | BDL                      | BDL            |

BDL = Below detection limit  
NS = Not Sampled

Prepared by/Date: MPL/03-03-2024  
Checked by/Date: JMB/03-05-2024

TABLE 9-1: WELL CONSTRUCTION AND SURVEY INFORMATION  
Bonnell Aluminum, Inc., Newnan, Georgia  
PCC Permit Renewal Application, 2024

| WELL ID | WELL TYPE | DATE INSTALLED | DRILLER  | ELEVATION PVC CASING (ft NGVD) | PAD ELEVATION (ft NGVD) | ELEVATION WELL BOTTOM (ft NGVD) | TOTAL WELL DEPTH (ft bgs) | AUGER REFUSAL | AUGER DIAMETER (in) | DEPTH TO SCREEN (ft) | SCREEN LENGTH (ft) | SLOT SIZE (in) | DEPTH TO SAND (ft) | DEPTH TO BENTONITE (ft) | GEOLOGIC UNIT MONITORED | WELL COORDINATES NORTHING EASTING (State Plane, ft) |
|---------|-----------|----------------|----------|--------------------------------|-------------------------|---------------------------------|---------------------------|---------------|---------------------|----------------------|--------------------|----------------|--------------------|-------------------------|-------------------------|-----------------------------------------------------|
| MW2SR   | TYPE II   | 9/20/1990      | LAYNE    | 918.60                         | 917.90                  | 905.10                          | 13.5                      | NO            | 8                   | 2.5                  | 10                 | 1.0            | 1.0                | 0.9                     | SAPROLITE               | 1230454.0 301086.6                                  |
| MW2DR   | TYPE II   | 9/20/1990      | LAYNE    | 918.40                         | 918.00                  | 878.90                          | 39.5                      | YES           | 8                   | 29.5                 | 10                 | 0.01           | 19.0               | 16.0                    | SAPROLITE               | 1230451.6 301079.0                                  |
| MW4SR   | TYPE II   | 9/21/1990      | LAYNE    | 909.80                         | 907.80                  | 880.00                          | 28.0                      | NO            | 8                   | 18.0                 | 10                 | 0.01           | 16.0               | 10.0                    | SAPROLITE               | 1229378.7 300519.6                                  |
| MW7D    | TYPE II   | 9/22/1989      | ATEC     | 903.30                         | 900.70                  | 855.80                          | 47.5                      | YES           | 8                   | 37.0                 | 10                 | 0.01           | 34.0               | 30.0                    | SAPROLITE               | 1230256.8 300293.5                                  |
| MW13S   | TYPE II   | 11/29/1989     | ATEC     | 952.50                         | 950.40                  | 927.50                          | 25.0                      | NO            | 9                   | 15.0                 | 10                 | 0.01           | 13.0               | 10.5                    | SAPROLITE               | 1231252.6 3002075.1                                 |
| MW17D   | TYPE II   | 4/27/1990      | LAYNE    | 912.60                         | 911.10                  | 878.20                          | 34.4                      | YES           | 8                   | 34.4                 | 10                 | 0.01           | 22.0               | 20.0                    | SAPROLITE               | 1229374.1 300619.6                                  |
| MW18S   | TYPE II   | 5/1/1990       | LAYNE    | 903.80                         | 901.70                  | 883.00                          | 20.8                      | NO            | 8                   | 10.3                 | 10                 | 0.01           | 8.3                | 6.3                     | SAPROLITE               | 1229517.9 300563.4                                  |
| MW18D   | TYPE II   | 5/1/1990       | LAYNE    | 903.90                         | 901.80                  | 869.30                          | 34.6                      | YES           | 8                   | 24.1                 | 10                 | 0.01           | 22.1               | 20.1                    | SAPROLITE               | 1229522.4 300563.3                                  |
| MW19S   | TYPE II   | 4/26/1990      | LAYNE    | 906.90                         | 907.00                  | 875.70                          | 31.2                      | NO            | 8                   | 20.8                 | 10                 | 0.01           | 18.8               | 16.8                    | SAPROLITE               | 1229447.1 300351.6                                  |
| MW19D   | TYPE II   | 4/20/1990      | LAYNE    | 907.00                         | 907.10                  | 863.80                          | 43.2                      | YES           | 8                   | 32.8                 | 10                 | 0.01           | 30.8               | 28.8                    | SAPROLITE               | 1229444.9 300355.3                                  |
| MW20S   | TYPE II   | 4/30/1990      | LAYNE    | 880.30                         | 880.40                  | 864.80                          | 15.5                      | NO            | 8                   | 5.1                  | 10                 | 0.01           | 3.1                | 1.1                     | SAPROLITE               | 1229603.2 300053.8                                  |
| MW20D   | TYPE II   | 4/30/1990      | LAYNE    | 880.00                         | 880.30                  | 839.90                          | 40.1                      | YES           | 8                   | 29.6                 | 10                 | 0.01           | 27.6               | 25.6                    | SAPROLITE               | 1229603.7 300048.9                                  |
| MW21D   | TYPE II   | 5/3/1990       | LAYNE    | 871.90                         | 871.90                  | 831.30                          | 40.6                      | YES           | 8                   | 30.2                 | 10                 | 0.01           | 28.2               | 26.2                    | SAPROLITE               | 1229726.1 300984.9                                  |
| MW24D   | TYPE II   | 5/3/1990       | LAYNE    | 926.20                         | 926.20                  | 887.70                          | 38.5                      | YES           | 8                   | 28.0                 | 10                 | 0.01           | 26.0               | 24.0                    | SAPROLITE               | 1229399.6 300956.0                                  |
| MW26S   | TYPE II   | 5/21/1990      | LAYNE    | 935.50                         | 935.90                  | 913.60                          | 21.9                      | NO            | 8                   | 11.5                 | 10                 | 0.01           | 9.5                | 7.5                     | SAPROLITE               | 1230306.8 301422.0                                  |
| MW26D   | TYPE II   | 5/21/1990      | LAYNE    | 935.50                         | 935.90                  | 889.90                          | 45.6                      | YES           | 8                   | 35.1                 | 10                 | 0.01           | 33.1               | 31.1                    | SAPROLITE               | 1230308.6 301420.3                                  |
| MW27S   | TYPE II   | 5/22/1990      | LAYNE    | 914.20                         | 911.50                  | 902.50                          | 11.7                      | NO            | 8                   | 1.3                  | 10                 | 0.01           | 0.3                | 0.1                     | SAPROLITE               | 1230295.7 301218.2                                  |
| MW27D   | TYPE II   | 5/22/1990      | LAYNE    | 912.30                         | 911.50                  | 883.00                          | 29.3                      | YES           | 8                   | 18.8                 | 10                 | 0.01           | 16.8               | 14.8                    | SAPROLITE               | 1230298.8 301222.0                                  |
| MW28S   | TYPE II   | 5/23/1990      | LAYNE    | 909.60                         | 908.20                  | 896.90                          | 12.7                      | NO            | 8                   | 2.3                  | 10                 | 0.01           | 0.3                | 0.0                     | SAPROLITE               | 1230041.7 301034.9                                  |
| MW28D   | TYPE II   | 5/23/1990      | LAYNE    | 909.80                         | 908.20                  | 881.00                          | 28.8                      | YES           | 8                   | 18.4                 | 10                 | 0.01           | 16.4               | 14.4                    | SAPROLITE               | 1230040.8 301039.3                                  |
| MW31D   | TYPE II   | 7/10/1990      | LAYNE    | 928.80                         | 925.80                  | 891.80                          | 37.0                      | YES           | 8                   | 27.0                 | 10                 | 0.01           | 25.0               | 22.5                    | SAPROLITE               | 1229633.6 300729.8                                  |
| MW32S   | TYPE II   | 7/10/1990      | LAYNE    | 922.70                         | 920.80                  | 887.70                          | 35.0                      | NO            | 8                   | 25.0                 | 10                 | 0.01           | 23.0               | 20.5                    | SAPROLITE               | 1229782.9 300704.5                                  |
| MW32D   | TYPE II   | 7/10/1990      | LAYNE    | 922.60                         | 920.90                  | 877.60                          | 45.0                      | YES           | 8                   | 35.0                 | 10                 | 0.01           | 33.0               | 30.5                    | SAPROLITE               | 1229786.5 300704.9                                  |
| MW35D   | TYPE II   | 7/16/1990      | LAYNE    | 922.30                         | 920.40                  | 898.30                          | 24.0                      | YES           | 8                   | 14.0                 | 10                 | 0.01           | 11.5               | 9.5                     | SAPROLITE               | 1229892.3 300933.7                                  |
| MW36S   | TYPE II   | 8/7/1990       | LAYNE    | 940.90                         | 940.90                  | 915.90                          | 25.0                      | NO            | 8                   | 15.0                 | 10                 | 0.01           | 13.0               | 10.0                    | SAPROLITE               | 1231001.7 301953.5                                  |
| MW36D   | TYPE II   | 8/7/1990       | LAYNE    | 941.00                         | 941.00                  | 900.60                          | 40.4                      | YES           | 8                   | 35.0                 | 5                  | 0.01           | 33.0               | 30.5                    | SAPROLITE               | 1230997.7 301957.4                                  |
| MW37D   | TYPE II   | 8/8/1990       | LAYNE    | 932.40                         | 932.50                  | 869.40                          | 63.0                      | YES           | 8                   | 53.0                 | 10                 | 0.01           | 51.0               | 48.0                    | SAPROLITE               | 1230125.4 301763.9                                  |
| MW39D   | TYPE II   | 8/13/1990      | LAYNE    | 927.90                         | 928.00                  | 892.70                          | 35.2                      | YES           | 8                   | 25.0                 | 10                 | 0.01           | 23.0               | 20.0                    | SAPROLITE               | 1229905.2 301235.6                                  |
| MW40D   | TYPE II   | 8/17/1990      | SUNRISE  | 938.70                         | 938.90                  | 912.70                          | 26.0                      | YES           | 8                   | 16.0                 | 10                 | 0.01           | 14.0               | 11.0                    | SAPROLITE               | 1230812.2 301765.7                                  |
| MW42S   | TYPE II   | 11/7/1990      | LAYNE    | 891.70                         | 889.10                  | 866.20                          | 25.5                      | NO            | 8                   | 15.5                 | 10                 | 0.01           | 12.0               | 9.4                     | SAPROLITE               | 1229998.9 300027.0                                  |
| MW43S   | TYPE II   | 5/30/1990      | LAYNE    | 881.60                         | 879.00                  | 859.60                          | 22.0                      | NO            | 10                  | 6.8                  | 10                 | 0.01           | 2.5                | 0.0                     | SAPROLITE               | 1230160.0 300050.0                                  |
| MW44S   | TYPE II   | 5/31/1990      | LAYNE    | 890.70                         | 888.20                  | 871.70                          | 19.0                      | NO            | 10                  | 7.2                  | 10                 | 0.01           | 2.1                | 0.0                     | SAPROLITE               | 1230492.7 300105.4                                  |
| MW44D   | TYPE II   | 5/31/1990      | LAYNE    | 890.80                         | 888.10                  | 851.30                          | 39.5                      | YES           | 10                  | 29.5                 | 10                 | 0.01           | 27.0               | 25.0                    | SAPROLITE               | 1230483.8 300105.1                                  |
| MW45S   | TYPE II   | 5/14/1992      | LAYNE    | 898.00                         | 895.40                  | 881.68                          | 16.3                      | NO            | 8                   | 4.0                  | 10                 | 0.01           | 3.0                | 1.5                     | SAPROLITE               | 1230665.6 300199.8                                  |
| MW48S   | TYPE II   | 12/7/1995      | KILMAN   | 898.40                         | 896.30                  | 877.40                          | 21.0                      | NO            | 8                   | 5.0                  | 15                 | 0.02           | 4.0                | 2.0                     | SAPROLITE               | 1230242.3 300747.8                                  |
| MW49S   | TYPE II   | 12/7/1995      | KILMAN   | 901.20                         | 898.70                  | 887.20                          | 14.0                      | YES           | 8                   | 4.0                  | 10                 | 0.02           | 3.5                | 2.0                     | SAPROLITE               | 1230178.8 300781.2                                  |
| MW50S   | TYPE II   | 12/7/1995      | KILMAN   | 898.50                         | 895.70                  | 883.50                          | 15.0                      | YES           | 8                   | 5.0                  | 10                 | 0.02           | 4.5                | 2.0                     | SAPROLITE               | 1230085.6 300817.6                                  |
| MW51S   | TYPE II   | 10/23/1997     | ENV. EX. | 929.10                         | 927.40                  | 907.97                          | 21.1                      | YES           | 6                   | 8.5                  | 10                 | 0.01           | 6.5                | 4.5                     | SAPROLITE               | 1230289.1 301318.7                                  |
| MW52S   | TYPE II   | 1/13/1997      | ENV. EX. | 929.90                         | 927.40                  | 910.40                          | 19.5                      | YES           | 6                   | 6.5                  | 10                 | 0.01           | 5.0                | 3.5                     | SAPROLITE               | 1230256.7 301328.5                                  |
| MW53S   | TYPE II   | 11/24/1997     | ENV. EX. | 904.20                         | 901.40                  | 883.45                          | 20.8                      | NO            | 8                   | 8.0                  | 10                 | 0.01           | 6.0                | 4.0                     | SAPROLITE               | 1229746.5 3003486.6                                 |
| MW54S   | TYPE II   | 11/25/1997     | ENV. EX. | 895.90                         | 893.10                  | 878.03                          | 17.9                      | NO            | 8                   | 5.0                  | 10                 | 0.01           | 3.0                | 1.0                     | SAPROLITE               | 1230028.0 300287.0                                  |
| MW73S   | TYPE II   | 10/12/2006     | PDMMT    | 938.30                         | 938.50                  | 909.37                          | 28.9                      | NO            | 8                   | 18.0                 | 10                 | 0.01           | 16.0               | 14.0                    | SAPROLITE               | 1230625.6 301622.5                                  |
| MW75S   | TYPE II   | 10/13/2006     | PDMMT    | 938.30                         | 938.60                  | 907.97                          | 30.3                      | NO            | 8                   | 20.0                 | 10                 | 0.01           | 18.0               | 15.0                    | SAPROLITE               | 1230464.4 301477.3                                  |
| MW76S   | TYPE II   | 10/13/2006     | PDMMT    | 938.10                         | 938.30                  | 907.73                          | 30.4                      | NO            | 8                   | 20.0                 | 10                 | 0.01           | 18.0               | 15.0                    | SAPROLITE               | 1230417.1 301417.7                                  |
| MW76D   | TYPE II   | 4/23/2012      | PDMMT    | 938.10                         | 938.40                  | 893.10                          | 45.0                      | YES           | 8                   | 35.0                 | 10                 | 0.01           | 32.0               | 2.0                     | SAPROLITE               | 1230420.5 301423.1                                  |
| MW77S   | TYPE II   | 1/16/2007      | PDMMT    | 937.80                         | 938.40                  | 908.07                          | 29.7                      | NO            | 8                   | 20.0                 | 10                 | 0.01           | 17.0               | 16.0                    | SAPROLITE               | 1230535.8 301559.5                                  |
| MW77D   | TYPE II   | 4/23/2012      | PDMMT    | 938.20                         | 938.40                  | 897.20                          | 41.0                      | YES           | 8                   | 20.0                 | 10                 | 0.01           | 33.0               | 2.0                     | SAPROLITE               | 1230539.3 301562.9                                  |
| MW78S   | TYPE II   | 1/16/2007      | PDMMT    | 938.40                         | 938.60                  | 908.51                          | 29.9                      | NO            | 8                   | 20.0                 | 10                 | 0.01           | 18.0               | 16.0                    | SAPROLITE               | 1230439.5 301455.1                                  |
| MW79S   | TYPE II   | 3/5/2007       | PDMMT    | 938.30                         | 938.60                  | 907.97                          | 30.3                      | NO            | 8                   | 20.0                 | 10                 | 0.01           | 17.5               | 16.0                    | SAPROLITE               | 1230472.5 301404.0                                  |

TABLE 9-1

TABLE 9-1: WELL CONSTRUCTION AND SURVEY INFORMATION  
Bonnell Aluminum, Inc., Newnan, Georgia  
PCC Permit Renewal Application, 2024

| WELL ID | WELL TYPE | DATE INSTALLED | DRILLER   | ELEVATION PVC CASING (ft NGVD) | PAD ELEVATION (ft NGVD) | ELEVATION WELL BOTTOM (ft NGVD) | TOTAL WELL DEPTH (ft bgs) | AUGER REFUSAL | AUGER DIAMETER (in) | DEPTH TO SCREEN (ft) | SCREEN LENGTH (ft) | SLOT SIZE (in) | DEPTH TO SAND (ft) | DEPTH TO BENTONITE (ft) | GEOLOGIC UNIT MONITORED | WELL COORDINATES NORTHING Plate, ft) | EASTING ft) |
|---------|-----------|----------------|-----------|--------------------------------|-------------------------|---------------------------------|---------------------------|---------------|---------------------|----------------------|--------------------|----------------|--------------------|-------------------------|-------------------------|--------------------------------------|-------------|
| MW80S   | TYPE II   | 3/6/2007       | PDMMT     | 938.10                         | 938.60                  | 907.76                          | 30.3                      | NO            | 8                   | 20.0                 | 10                 | 0.01           | 17.5               | 16.0                    | SAPROLITE               | 1230560.6                            | 301474.3    |
| MW81S   | TYPE II   | 3/6/2007       | PDMMT     | 938.20                         | 938.50                  | 907.87                          | 30.3                      | NO            | 8                   | 20.0                 | 10                 | 0.01           | 17.5               | 16.0                    | SAPROLITE               | 1230564.5                            | 301554.7    |
| MW82S   | TYPE II   | 3/7/2007       | PDMMT     | 934.30                         | 934.60                  | 908.00                          | 26.3                      | NO            | 8                   | 20.0                 | 10                 | 0.01           | 14.3               | 16.0                    | SAPROLITE               | 1230420.4                            | 301461.2    |
| MW82D   | TYPE II   | 4/23/2012      | PDMMT     | 934.30                         | 934.60                  | 900.30                          | 34.0                      | YES           | 8                   | 24.0                 | 10                 | 0.10           | 22.0               | 2.0                     | SAPROLITE               | 1230414.4                            | 301467.4    |
| MW83S   | TYPE II   | 3/7/2007       | PDMMT     | 934.10                         | 934.60                  | 908.27                          | 25.8                      | NO            | 8                   | 20.0                 | 10                 | 0.01           | 14.3               | 16.0                    | SAPROLITE               | 1230475.0                            | 301538.1    |
| MW83D   | TYPE II   | 1/11/2016      | Atlas Geo | 934.20                         | 934.50                  | 893.20                          | 41.0                      | YES           | 8-8.25              | 31.0                 | 10                 | 0.01           | 28.0               | 21.0                    | SAPROLITE/PWR           | 1230466.8                            | 301547.5    |
| MW85D   | TYPE III  | 10/26/2009     | PDMMT     | 938.30                         | 938.50                  | 898.20                          | 40.0                      | YES           | 10 to 4.5           | 35.0                 | 5                  | 0.01           | 33.0               | 36.0                    | PWR                     | 1230553.5                            | 301547.5    |
| MW86D   | TYPE III  | 10/27/2009     | PDMMT     | 938.20                         | 938.50                  | 898.20                          | 40.0                      | YES           | 10 to 4.5           | 35.0                 | 5                  | 0.01           | 33.0               | 36.0                    | SAPROLITE               | 1230493.3                            | 301505.2    |
| MW87D   | TYPE III  | 12/29/2010     | PDMMT     | 938.30                         | 938.60                  | 893.30                          | 45.0                      | NO            | 10 to 4.5           | 43.0                 | 2                  | 0.01           | 41.0               | 38.0                    | PWR                     | 1230472.8                            | 301478.7    |
| MW88D   | TYPE III  | 12/29/2010     | PDMMT     | 937.90                         | 938.50                  | 902.90                          | 35.0                      | NO            | 10 to 4.5           | 33.0                 | 2                  | 0.01           | 30.0               | 28.0                    | PWR                     | 1230555.3                            | 301550.6    |
| MW89D   | TYPE III  | 1/11/2010      | PDMMT     | 938.30                         | 938.60                  | 903.30                          | 35.0                      | NO            | 10 to 4.5           | 33.0                 | 2                  | 0.01           | 31.0               | 29.0                    | PWR                     | 1230471.1                            | 301476.4    |
| MW90D   | TYPE II   | 9/20/2010      | PDMMT     | 861.20                         | 861.20                  | 833.90                          | 27.3                      | YES           | 8                   | 17.3                 | 10                 | 0.01           | 15.0               | 13.0                    | SAPROLITE               | 1228839.8                            | 299693.7    |
| MW91D   | TYPE II   | 9/20/2010      | PDMMT     | 873.80                         | 870.70                  | 836.40                          | 37.4                      | YES           | 8                   | 27.4                 | 10                 | 0.01           | 25.0               | 23.0                    | SAPROLITE               | 1228828.0                            | 299787.6    |
| MW92D   | TYPE II   | 9/21/2010      | PDMMT     | 931.40                         | 928.20                  | 889.40                          | 42.0                      | YES           | 8                   | 32.0                 | 10                 | 0.01           | 30.0               | 30.0                    | SAPROLITE               | 1228872.9                            | 300493.6    |
| MW93D   | TYPE II   | 9/21/2010      | PDMMT     | 905.00                         | 901.70                  | 869.50                          | 35.5                      | YES           | 8                   | 25.0                 | 10                 | 0.01           | 23.0               | 21.0                    | SAPROLITE               | 1229054.9                            | 300446.3    |
| MW93S   | TYPE II   | 7/9/1990       | LAYNE     | 868.60                         | 868.90                  | 853.60                          | 15.0                      | NO            | 8                   | 5.0                  | 10                 | 0.01           | 4.0                | 2.0                     | SAPROLITE               | 1229431.6                            | 299969.9    |
| MW95D   | TYPE II   | 7/9/1990       | LAYNE     | 868.80                         | 869.00                  | 838.80                          | 30.0                      | YES           | 8                   | 20.0                 | 10                 | 0.01           | 17.5               | 15.5                    | SAPROLITE               | 1229434.6                            | 299971.4    |
| MW95S   | TYPE II   | 7/11/1990      | LAYNE     | 887.10                         | 885.10                  | 871.10                          | 16.0                      | NO            | 8                   | 6.0                  | 10                 | 0.01           | 5.0                | 3.0                     | SAPROLITE               | 1229356.6                            | 300244.8    |
| MW95D   | TYPE II   | 7/11/1990      | LAYNE     | 886.90                         | 885.10                  | 858.40                          | 28.5                      | YES           | 8                   | 18.8                 | 10                 | 0.01           | 17.0               | 14.7                    | SAPROLITE               | 1229355.7                            | 300243.2    |
| MW95S   | TYPE II   | 7/12/1990      | LAYNE     | 866.20                         | 866.10                  | 851.20                          | 15.0                      | NO            | 8                   | 5.0                  | 10                 | 0.01           | 4.0                | 2.0                     | SAPROLITE               | 1229234.4                            | 299897.6    |
| MW95D   | TYPE II   | 7/12/1990      | LAYNE     | 865.80                         | 865.90                  | 821.00                          | 44.8                      | YES           | 8                   | 35.0                 | 10                 | 0.01           | 32.5               | 14.5                    | SAPROLITE               | 1229237.4                            | 299892.4    |
| MW95S   | TYPE II   | 7/12/1990      | LAYNE     | 878.60                         | 879.20                  | 862.60                          | 16.0                      | NO            | 8                   | 6.0                  | 10                 | 0.01           | 4.5                | 2.0                     | SAPROLITE               | 1229148.9                            | 300089.5    |
| MW95D   | TYPE II   | 7/19/1990      | LAYNE     | 879.10                         | 879.00                  | 834.10                          | 45.0                      | YES           | 8                   | 35.0                 | 10                 | 0.01           | 33.0               | 30.5                    | SAPROLITE               | 1229151.0                            | 300086.6    |
| MW95D   | TYPE II   | 7/19/1990      | LAYNE     | 877.10                         | 877.10                  | 807.10                          | 70.0                      | YES           | 8                   | 60.0                 | 10                 | 0.01           | 57.5               | 55.0                    | SAPROLITE               | 1229244.2                            | 299658.3    |
| MW95D   | TYPE II   | 11/6/1990      | LAYNE     | 861.70                         | 862.00                  | 825.50                          | 36.2                      | YES           | 8                   | 26.2                 | 10                 | 0.01           | 22.5               | 20.0                    | SAPROLITE               | 1228927.5                            | 299726.9    |
| MW95D   | TYPE II   | 11/5/1990      | LAYNE     | 894.30                         | 894.40                  | 875.30                          | 19.0                      | YES           | 8                   | 9.0                  | 10                 | 0.01           | 6.5                | 4.5                     | SAPROLITE               | 1229121.3                            | 300644.2    |
| MW95D   | TYPE II   | 10/4/1991      | SUNRISE   | 874.10                         | 874.10                  | 832.10                          | 42.0                      | YES           | 8                   | 32.0                 | 10                 | 0.01           | 30.0               | 28.0                    | SAPROLITE               | 1228980.9                            | 299878.4    |
| MWBR1   | TYPE III  | 9/29/1992      | LAYNE     | 903.60                         | 900.60                  | 818.60                          | 85.0                      | N/A           | 8-12                | 65.0                 | 20                 | 0.01           | 62.0               | 60.0                    | BEDROCK                 | 1230247.0                            | 300278.5    |
| MWBR3   | TYPE III  | 9/30/1992      | LAYNE     | 865.70                         | 865.50                  | 702.98                          | 162.7                     | N/A           | 4-12                | 62.5                 | OPEN               | N/A            | N/A                | N/A                     | BEDROCK                 | 1229242.3                            | 299881.4    |
| MWBR5   | TYPE III  | 10/6/1992      | LAYNE     | 903.10                         | 900.90                  | 794.10                          | 109.0                     | N/A           | 4-8                 | 85.0                 | OPEN               | N/A            | N/A                | N/A                     | BEDROCK                 | 1230277.5                            | 300286.1    |
| MWBR6   | TYPE III  | 2/8/1993       | LAYNE     | 879.60                         | 879.40                  | 750.60                          | 129.0                     | N/A           | 8-12                | 89.0                 | OPEN               | N/A            | N/A                | N/A                     | BEDROCK                 | 1229266.6                            | 299669.3    |
| RW1     | TYPE II   | 4/17/1994      | LAYNE     | 933.60                         | 934.19                  | 883.60                          | 50.0                      | NO            | 12                  | 20.0                 | 30                 | 0.02           | 16.0               | 14.0                    | SAPROLITE               | 1230534.5                            | 301650.7    |
| RW3     | TYPE II   | 8/9/1993       | ENV. EX.  | 900.40                         | 901.10                  | 855.40                          | 45.0                      | NO            | 12                  | 15.0                 | 30                 | 0.01           | 13.0               | 11.0                    | SAPROLITE               | 1230193.0                            | 300262.8    |
| RW4     | TYPE II   | 4/22/1994      | LAYNE     | 907.70                         | 908.10                  | 855.70                          | 52.0                      | NO            | 12                  | 22.0                 | 30                 | 0.02           | 15.0               | 14.0                    | SAPROLITE               | 1229971.5                            | 300939.3    |
| RW5     | TYPE II   | 4/13/1994      | LAYNE     | 901.30                         | 902.30                  | 851.30                          | 50.0                      | NO            | 12                  | 20.0                 | 30                 | 0.02           | 16.0               | 15.0                    | SAPROLITE               | 1229668.3                            | 300437.9    |
| RW6     | TYPE II   | 12/7/1992      | LAYNE     | 909.60                         | 909.10                  | 878.60                          | 31.0                      | NO            | 18                  | 11.0                 | 20                 | 0.02           | 9.0                | 7.5                     | SAPROLITE               | 1229378.3                            | 300540.5    |
| RW7     | TYPE II   | 7/14/1994      | LAYNE     | 866.60                         | 866.80                  | 806.60                          | 60.0                      | NO            | 14                  | 20.0                 | 40                 | 0.02           | 18.0               | 16.5                    | SAPROLITE               | 1229360.9                            | 299944.2    |
| RW8     | TYPE II   | 11/20/1997     | ENV. EX.  | 905.90                         | 906.00                  | 873.65                          | 32.3                      | YES           | 10                  | 12.0                 | 20                 | 0.02           | 10.0               | 7.5                     | SAPROLITE               | 1229497.3                            | 300603.8    |
| RW9     | TYPE II   | 11/17/1997     | ENV. EX.  | 901.50                         | 901.20                  | 870.50                          | 31.0                      | YES           | 10                  | 11.0                 | 20                 | 0.02           | 9.0                | 7.0                     | SAPROLITE               | 1229572.2                            | 300517.1    |
| RW10    | TYPE II   | 11/12/1997     | ENV. EX.  | 901.70                         | 901.80                  | 871.21                          | 30.5                      | YES           | 10                  | 11.0                 | 20                 | 0.02           | 9.0                | 7.0                     | SAPROLITE               | 1229600.9                            | 300461.1    |
| RW11    | TYPE II   | 11/11/1997     | ENV. EX.  | 900.50                         | 900.50                  | 859.98                          | 40.5                      | YES           | 10                  | 10.0                 | 30                 | 0.02           | 8.0                | 6.0                     | SAPROLITE               | 1229773.1                            | 300550.4    |
| RW13    | TYPE II   | 11/19/1997     | ENV. EX.  | 887.60                         | 887.50                  | 864.37                          | 23.2                      | YES           | 10                  | 8.0                  | 15                 | 0.02           | 6.5                | 4.0                     | SAPROLITE               | 1229337.9                            | 300289.1    |
| RW14    | TYPE II   | 12/28/2011     | KILMAN    | 931.20                         | 931.70                  | 888.04                          | 43.2                      | YES           | 10                  | 22.0                 | 20                 | 0.01           | 19.0               | 17.0                    | SAPROLITE               | 1230345.3                            | 301356.6    |
| RW15    | TYPE II   | 12/29/2011     | KILMAN    | 931.10                         | 931.70                  | 883.44                          | 47.7                      | YES           | 10                  | 28.0                 | 20                 | 0.01           | 25.0               | 22.0                    | SAPROLITE               | 1230336.1                            | 301363.8    |
| PZM1A   | TYPE II   | 10/29/1996     | ENV. EX.  | 934.30                         | 934.50                  | 907.70                          | 26.6                      | NO            | 2                   | 22.0                 | 5                  | 0.01           | 20.0               | 18.0                    | SAPROLITE               | 1230555.5                            | 301669.6    |
| PZM1B   | TYPE II   | 10/29/1996     | ENV. EX.  | 934.30                         | 934.50                  | 911.30                          | 23.0                      | NO            | 2                   | 18.0                 | 5                  | 0.01           | 15.5               | 10.0                    | SAPROLITE               | 1230550.1                            | 301675.9    |
| PZM3A   | TYPE II   | 10/28/1996     | ENV. EX.  | 903.00                         | 900.00                  | 875.70                          | 27.3                      | NO            | 2                   | 18.6                 | 5                  | 0.01           | 12.6               | 8.5                     | SAPROLITE               | 1230206.0                            | 300254.5    |
| PZM3B   | TYPE II   | 10/28/1996     | ENV. EX.  | 902.90                         | 900.00                  | 878.40                          | 24.5                      | NO            | 2                   | 19.5                 | 5                  | 0.01           | 15.0               | 8.0                     | SAPROLITE               | 1230219.8                            | 300255.1    |
| PZM4A   | TYPE II   | 10/28/1996     | ENV. EX.  | 910.30                         | 907.80                  | 893.29                          | 17.0                      | NO            | 2                   | 9.3                  | 5                  | 0.01           | 6.0                | 2.0                     | SAPROLITE               | 1229975.7                            | 300926.3    |
| PZM4B   | TYPE II   | 10/28/1996     | ENV. EX.  | 909.70                         | 907.00                  | 891.85                          | 17.9                      | NO            | 2                   | 10.0                 | 5                  | 0.01           | 7.0                | 4.0                     | SAPROLITE               | 1229994.7                            | 300930.4    |

TABLE 9-1

TABLE 9-1: WELL CONSTRUCTION AND SURVEY INFORMATION  
Bonnell Aluminum, Inc., Newnan, Georgia  
PCC Permit Renewal Application, 2024

| WELL ID | WELL TYPE | DATE INSTALLED | DRILLER  | ELEVATION PVC CASING (ft NGVD) | PAD ELEVATION (ft NGVD) | ELEVATION WELL BOTTOM (ft NGVD) | TOTAL WELL DEPTH (ft bgs) | AUGER REFUSAL | AUGER DIAMETER (in) | DEPTH TO SCREEN (ft) | SCREEN LENGTH (ft) | SLOT SIZE (in) | DEPTH TO SAND (ft) | DEPTH TO BENTONITE (ft) | GEOLOGIC UNIT MONITORED | WELL COORDINATES |                           |
|---------|-----------|----------------|----------|--------------------------------|-------------------------|---------------------------------|---------------------------|---------------|---------------------|----------------------|--------------------|----------------|--------------------|-------------------------|-------------------------|------------------|---------------------------|
|         |           |                |          |                                |                         |                                 |                           |               |                     |                      |                    |                |                    |                         |                         | NORTHING         | EASTING (State Plane, ft) |
| PZM5A   | TYPE II   | 10/28/1996     | ENV. EX. | 905.30                         | 902.40                  | 869.13                          | 36.2                      | NO            | 2                   | 28.0                 | 5                  | 0.01           | 25.0               | 20.0                    | SAPROLITE               | 1229659.9        | 300443.6                  |
| PZM5B   | TYPE II   | 10/28/1996     | ENV. EX. | 905.00                         | 902.30                  | 868.87                          | 36.1                      | NO            | 2                   | 28.4                 | 5                  | 0.01           | 25.0               | 20.0                    | SAPROLITE               | 1229671.1        | 300451.8                  |
| PZM6A   | TYPE II   | 10/28/1996     | ENV. EX. | 911.80                         | 908.80                  | 874.41                          | 37.4                      | NO            | 2                   | 30.0                 | 5                  | 0.01           | 25.0               | 20.0                    | SAPROLITE               | 1229383.1        | 300551.4                  |
| PZM6B   | TYPE II   | 10/28/1996     | ENV. EX. | 912.00                         | 909.00                  | 873.61                          | 38.4                      | NO            | 2                   | 30.0                 | 5                  | 0.01           | 25.0               | 20.0                    | SAPROLITE               | 1229381.8        | 300566.5                  |
| PZM8A   | TYPE II   | 11/24/1997     | ENV. EX. | 909.30                         | 906.60                  | 876.62                          | 32.7                      | NO            | 8                   | 20.0                 | 10                 | 0.01           | 18.0               | 16.0                    | SAPROLITE               | 1229488.6        | 300610.9                  |
| PZM8B   | TYPE II   | 11/24/1997     | ENV. EX. | 907.90                         | 905.10                  | 875.15                          | 32.8                      | NO            | 8                   | 20.0                 | 10                 | 0.01           | 18.0               | 16.0                    | SAPROLITE               | 1229505.9        | 300587.1                  |
| PZM9A   | TYPE II   | 11/21/1997     | ENV. EX. | 904.60                         | 901.70                  | 872.60                          | 32.0                      | YES           | 8                   | 19.0                 | 10                 | 0.01           | 17.0               | 15.0                    | SAPROLITE               | 1229585.6        | 300526.0                  |
| PZM9B   | TYPE II   | 11/21/1997     | ENV. EX. | 904.90                         | 901.70                  | 873.13                          | 31.8                      | YES           | 8                   | 19.0                 | 10                 | 0.01           | 17.0               | 15.0                    | SAPROLITE               | 1229591.9        | 300533.2                  |
| PZM10A  | TYPE II   | 11/21/1997     | ENV. EX. | 904.70                         | 901.80                  | 871.62                          | 33.1                      | YES           | 8                   | 20.0                 | 10                 | 0.01           | 18.0               | 16.0                    | SAPROLITE               | 1229594.7        | 300474.0                  |
| PZM10B  | TYPE II   | 11/21/1997     | ENV. EX. | 904.30                         | 901.50                  | 871.43                          | 32.9                      | NO            | 8                   | 20.0                 | 10                 | 0.01           | 17.0               | 15.0                    | SAPROLITE               | 1229586.4        | 300488.6                  |
| PZM11A  | TYPE II   | 11/24/1997     | ENV. EX. | 903.40                         | 900.60                  | 870.49                          | 32.9                      | NO            | 8                   | 10.0                 | 20                 | 0.01           | 18.0               | 6.0                     | SAPROLITE               | 1229764.4        | 300541.7                  |
| PZM11B  | TYPE II   | 11/21/1997     | ENV. EX. | 903.20                         | 900.60                  | 870.51                          | 32.7                      | NO            | 8                   | 10.0                 | 20                 | 0.01           | 8.0                | 6.0                     | SAPROLITE               | 1229783.5        | 300572.2                  |
| PZM12A  | TYPE II   | 11/21/1997     | ENV. EX. | 903.00                         | 900.30                  | 870.04                          | 33.0                      | NO            | 8                   | 10.0                 | 20                 | 0.01           | 8.0                | 6.0                     | SAPROLITE               | 1229798.1        | 300592.6                  |
| PZM12B  | TYPE II   | 11/21/1997     | ENV. EX. | 900.80                         | 899.20                  | 868.01                          | 32.8                      | NO            | 8                   | 10.0                 | 20                 | 0.01           | 8.0                | 6.0                     | SAPROLITE               | 1229826.2        | 300589.3                  |
| PZM13A  | TYPE II   | 11/24/1997     | ENV. EX. | 890.50                         | 887.70                  | 865.07                          | 25.4                      | YES           | 8                   | 13.0                 | 10                 | 0.01           | 11.0               | 9.0                     | SAPROLITE               | 1229346.6        | 300282.6                  |
| PZM13B  | TYPE II   | 11/24/1997     | ENV. EX. | 890.80                         | 888.10                  | 867.80                          | 23.0                      | YES           | 8                   | 13.0                 | 10                 | 0.01           | 11.0               | 9.0                     | SAPROLITE               | 1229356.8        | 300275.5                  |

Notes:

- 1) bgs = below ground surface
- 2) in = inches
- 3) ft = feet
- 4) N/A = Not Available
- 5) NGVD = National Geodetic Vertical Datum
- 6) NM = Not Measured
- 7) PWR = Partially Weathered Rock
- 8) Type II wells are constructed with a single casing
- 9) Type III wells are constructed with a double casing.

Prepared by/Date: AWE/10-19-2021  
Checked by/Date: MPL/10-19-2021

**TABLE 9-2: PROPOSED 2024 PERMIT TABLE V, MONITORING WELL SAMPLING AND ANALYSIS**  
**Bonnell Aluminum, Inc., Newnan, Georgia**  
**PCC Permit Renewal Application, 2024**

| MONITORING WELL | SA = Semi-annually / A = Annually |          |           |          | MAINTENANCE ONLY |
|-----------------|-----------------------------------|----------|-----------|----------|------------------|
|                 | TABLE I                           | TABLE II | TABLE III | TABLE IV |                  |
| MW13S           |                                   | SA       | SA        |          |                  |
| MW2SR           | SA                                |          |           | A        |                  |
| MW4SR           | SA                                |          |           |          |                  |
| MW17D           |                                   | SA       |           | A        |                  |
| MW19S           | SA                                |          |           |          |                  |
| MW42S           |                                   |          |           | A        |                  |
| MW43S           |                                   |          |           |          |                  |
| MW44D           |                                   |          |           |          |                  |
| MW44S           |                                   |          |           |          |                  |
| MW45S           |                                   |          |           | A        |                  |
| MW48S           |                                   |          |           |          |                  |
| MW49S           | SA                                |          |           |          |                  |
| MW50S           | SA                                |          |           |          |                  |
| MW51S           |                                   |          | SA        |          |                  |
| MW52S           |                                   |          | SA        |          |                  |
| MW28D           | SA                                |          |           |          |                  |
| MW2DR           | A                                 |          |           |          |                  |
| MW7D            | A                                 |          |           |          |                  |
| MW19D           | SA                                |          |           |          |                  |
| MW20D           |                                   | A        |           |          |                  |
| MW21D           |                                   | A        |           |          |                  |
| MW24D           |                                   | A        |           |          |                  |
| MW27S           | SA                                |          |           |          |                  |
| MW31D           | SA                                |          |           |          |                  |
| MW32S           | SA                                |          |           |          |                  |
| MW36D           |                                   | A        |           |          |                  |
| MW37D           |                                   | A        |           |          |                  |
| MW39D           |                                   | A        |           |          |                  |
| MW40D           | SA                                |          |           |          |                  |
| MW54S           | A                                 |          |           |          |                  |
| MWOS1S          |                                   | SA       |           |          |                  |
| MWOS3D          | SA                                |          |           |          |                  |
| MWOS5D          |                                   | SA       |           |          |                  |
| MWOS6D          |                                   | SA       |           |          |                  |
| MWOS7D          |                                   | A        |           |          |                  |
| MWOS8D          |                                   | A        |           |          |                  |
| MWBR3           | A                                 |          |           |          |                  |
| MWBR6           |                                   | A        |           |          |                  |
| MW18D           |                                   |          |           |          | X                |
| MW18S           |                                   |          |           |          | X                |
| MW20S           |                                   |          |           |          | X                |
| MW26D           |                                   |          |           |          | X                |
| MW26S           |                                   |          |           |          | X                |
| MW27D           |                                   |          |           |          | X                |
| MW28S           |                                   |          |           |          | X                |

**TABLE 9-2: PROPOSED 2024 PERMIT TABLE V, MONITORING WELL SAMPLING AND ANALYSIS**  
**Bonnell Aluminum, Inc., Newnan, Georgia**  
**PCC Permit Renewal Application, 2024**

| MONITORING WELL | SA = Semi-annually / A = Annually |          |           |          | MAINTENANCE ONLY |
|-----------------|-----------------------------------|----------|-----------|----------|------------------|
|                 | TABLE I                           | TABLE II | TABLE III | TABLE IV |                  |
| MW32D           |                                   |          |           |          | X                |
| MW35D           |                                   |          |           |          | X                |
| MW36S           |                                   |          |           |          | X                |
| MW41D           |                                   |          |           |          | X                |
| MW53S           |                                   |          |           |          | X                |
| MW73S           |                                   |          |           |          | X                |
| MW75S           |                                   |          |           |          | X                |
| MW76D           |                                   |          |           |          | X                |
| MW76S           |                                   |          |           |          | X                |
| MW77D           |                                   |          |           |          | X                |
| MW77S           |                                   |          |           |          | X                |
| MW78S           |                                   |          |           |          | X                |
| MW79S           |                                   |          |           |          | X                |
| MW80S           |                                   |          |           |          | X                |
| MW81S           |                                   |          |           |          | X                |
| MW82D           |                                   |          |           |          | X                |
| MW82S           |                                   |          |           |          | X                |
| MW83D           |                                   |          |           |          | X                |
| MW83S           |                                   |          |           |          | X                |
| MW85D           |                                   |          |           |          | X                |
| MW86D           |                                   |          |           |          | X                |
| MW87D           |                                   |          |           |          | X                |
| MW88D           |                                   |          |           |          | X                |
| MW89D           |                                   |          |           |          | X                |
| MW90D           |                                   |          |           |          | X                |
| MW91D           |                                   |          |           |          | X                |
| MW92D           |                                   |          |           |          | X                |
| MW93D           |                                   |          |           |          | X                |
| MWOS1D          |                                   |          |           |          | X                |
| MWOS2D          |                                   |          |           |          | X                |
| MWOS2S          |                                   |          |           |          | X                |
| MWOS3S          |                                   |          |           |          | X                |
| MWOS4S          |                                   |          |           |          | X                |
| MWOS4D          |                                   |          |           |          | X                |
| MWBR1           |                                   |          |           |          | X                |
| MWBR5           |                                   |          |           |          | X                |

Prepared by/Date: MPL/02-18-2024  
Checked by/Date: JMB/02-29-2024



**TABLE 9-3: ANALYTICAL METHODS AND SAMPLING REQUIREMENTS**  
**Bonnell Aluminum, Inc., Newnan, Georgia**  
**PCC Permit Renewal Application, 2024**

| PARAMETER                  | ANALYTICAL METHOD | CONTAINER TYPE | PRESERVATIVE              | HOLDING TIME |
|----------------------------|-------------------|----------------|---------------------------|--------------|
| Volatile Organic Compounds | 8260              | 40 mL Vial (3) | 4°C±2°C<br>HCl to pH < 2  | 14 Days      |
| 1,1-Dichloroethene         |                   |                |                           |              |
| cis-1,2-Dichloroethene     |                   |                |                           |              |
| Ethylbenzene               |                   |                |                           |              |
| Tetrachloroethene          |                   |                |                           |              |
| Toluene                    |                   |                |                           |              |
| Total Xylene               |                   |                |                           |              |
| Trichloroethene            |                   |                |                           |              |
| Vinyl Chloride             |                   |                |                           |              |
| Metals                     |                   |                |                           |              |
| Chromium                   | 6010 or 6020      | 250 mL HDPE    | HNO <sub>3</sub> to pH <2 | 180 Days     |
| Nickel                     |                   |                |                           |              |

Current laboratory analytical methods are shown. During future groundwater monitoring events, analytical methods and associated containers and preservatives accepted by the EPD at that time will be used.

Prepared by/Date: MPL/02-18-2024  
 Checked by/Date: JMB/02-29-2024

**TABLE 9-4: PROPOSED 2024 GROUNDWATER PROTECTION STANDARDS**  
**Bonnell Aluminum, Inc., Newnan, Georgia**  
**PCC Permit Renewal Application, 2024**

| Table I: AIOH LTU, CROH LF, HWMA |                             |
|----------------------------------|-----------------------------|
| Constituent                      | 2024 Permit Mod GWPS (mg/L) |
| Tetrachloroethene                | 0.31                        |
| Trichloroethene                  | 0.014                       |
| cis-1,2-dichloroethene           | 0.16                        |
| Vinyl Chloride                   | 0.002                       |

| Table II: AIOH LTU, CROH LF, HWMA |                             |
|-----------------------------------|-----------------------------|
| Constituent                       | 2024 Permit Mod GWPS (mg/L) |
| Tetrachloroethene                 | 0.005                       |
| Trichloroethene                   | 0.005                       |
| cis-1,2-dichloroethene            | 0.07                        |
| Vinyl Chloride                    | 0.002                       |
| 1,1-Dichloroethene                | 0.007                       |

| Table III: Tank Farm Unit |                             |
|---------------------------|-----------------------------|
| Constituent               | 2024 Permit Mod GWPS (mg/L) |
| Tetrachloroethene         | 0.005                       |
| Trichloroethene           | 0.005                       |
| Toluene                   | 0.002                       |
| Ethylbenzene              | 0.002                       |
| Total Xylene              | 0.005                       |

| Table IV: Special Conditions Wells |                             |
|------------------------------------|-----------------------------|
| Constituent                        | 2024 Permit Mod GWPS (mg/L) |
| Chromium                           | 0.05                        |
| Nickel                             | 0.02                        |

GWPS: Groundwater Protection Standard

Prepared by/Date: MPL/02-18-2024  
Checked by/Date: JMB/02-29-2024

**TABLE 9-5: BACKGROUND MEAN AND VARIANCE DATA (MW13S)**

**Bonnell Aluminum, Inc., Newnan, Georgia**  
**PCC Permit Renewal Application, 2024**

|          | <b>pH</b> | <b>SPECIFIC<br/>CONDUCTANCE<br/>(umhos/cm)</b> | <b>TOTAL<br/>ORGANIC<br/>CARBON (mg/l)</b> | <b>TOTAL<br/>ORGANIC<br/>HALOGENS<br/>(ug/l)</b> | <b>REPORT<br/>NUMBER</b> |
|----------|-----------|------------------------------------------------|--------------------------------------------|--------------------------------------------------|--------------------------|
|          | 5.09      | 120.00                                         | 0.84                                       | 13.60                                            | 24687-10                 |
|          | 5.22      | 120.00                                         | 0.76                                       | 10.80                                            |                          |
|          | 5.07      | 120.00                                         | 0.83                                       | 15.60                                            |                          |
|          | 5.03      | 120.00                                         | 0.89                                       | 8.00                                             |                          |
|          | 4.96      | 120.00                                         | 1.18                                       | 22.00                                            | 25692-10                 |
|          | 5.01      | 124.00                                         | 1.09                                       | 22.00                                            |                          |
|          | 5.00      | 88.00                                          | 1.31                                       | 2.50                                             |                          |
|          | 4.93      | 90.00                                          | 1.37                                       | 9.90                                             |                          |
|          | 4.80      | 90.00                                          | 0.50                                       | 5.00                                             | 27498-10                 |
|          | 5.11      | 90.00                                          | 1.10                                       | 5.00                                             |                          |
|          | 5.12      | 90.00                                          | 0.80                                       | 14.30                                            |                          |
|          | 5.09      | 90.00                                          | 0.90                                       | 19.10                                            |                          |
|          | 5.23      | 80.00                                          | 5.50                                       | 13.70                                            | 29539-7                  |
|          | 5.09      | 80.00                                          | 4.40                                       | 5.10                                             |                          |
|          | 5.31      | 80.00                                          | 3.00                                       | 5.70                                             |                          |
|          | 5.12      | 80.00                                          | 2.10                                       | 8.70                                             |                          |
| Average  | 5.07      | 98.88                                          | 1.66                                       | 11.31                                            |                          |
| Variance | 0.01      | 299.98                                         | 1.92                                       | 35.93                                            |                          |

|         | <b>BARIUM<br/>(mg/l)</b> | <b>CHROMIUM<br/>(mg/l)</b> | <b>CADMIUM<br/>(mg/l)</b> | <b>LEAD<br/>(mg/l)</b> | <b>NICKEL<br/>(mg/l)</b> |
|---------|--------------------------|----------------------------|---------------------------|------------------------|--------------------------|
|         | BDL                      | BDL                        | BDL                       | BDL                    | BDL                      |
|         | BDL                      | BDL                        | BDL                       | BDL                    | BDL                      |
|         | BDL                      | BDL                        | BDL                       | BDL                    | BDL                      |
|         | BDL                      | BDL                        | BDL                       | BDL                    | BDL                      |
| Average | BDL                      | BDL                        | BDL                       | BDL                    | BDL                      |

|         | <b>PCE<br/>(mg/l)</b> | <b>TCE<br/>(mg/l)</b> | <b>TOLUENE<br/>(mg/l)</b> | <b>ETHYL<br/>BENZENE<br/>(mg/l)</b> | <b>TOTAL<br/>XYLENES<br/>(mg/l)</b> |
|---------|-----------------------|-----------------------|---------------------------|-------------------------------------|-------------------------------------|
|         | BDL                   | BDL                   | BDL                       | BDL                                 | BDL                                 |
|         | BDL                   | BDL                   | BDL                       | BDL                                 | BDL                                 |
|         | BDL                   | BDL                   | BDL                       | BDL                                 | BDL                                 |
|         | BDL                   | BDL                   | BDL                       | BDL                                 | BDL                                 |
| Average | BDL                   | BDL                   | BDL                       | BDL                                 | BDL                                 |

Notes:

1. BDL - below detection limit
2. Data source: 2014 PCC Permit Renewal Application.

Prepared by/Date: MPL/02-18-2024

Checked by/Date: JMB/02-29-2024