



# **Heidelberg Materials**

## **Giant Resource Recovery - Attalla**

### **Audit Book**

1229 Valley Drive  
Attalla, AL 35954  
EPA ID No. ALD070513767

## ***A History of Resource Recovery and Energy Reutilization***

**Giant Cement Holding, Inc., (GCHI)** manufactures high quality portland cement and masonry cement through its subsidiaries **Giant Cement Company (Giant Cement)** in Harleyville, SC, and **Keystone Cement Company (Keystone Cement)** in Bath, PA. For over thirty-five years, these facilities have carefully utilized hazardous and non-hazardous waste-derived fuels as alternatives to traditional fossil fuel in their cement production processes.

Giant Cement began manufacturing cement at its Harleyville, SC, facility in 1947. It opened **Giant Resource Recovery, Inc.-Harleyville (GRR-Harleyville)**, its waste fuel processing and resource recovery facility, in 1987. Keystone opened its cement production operation in Bath, PA, in 1928. It began processing and burning waste as fuel in 1976 and merged with Giant Cement to form GCHI in 1994.

In 1999, GCHI furthered its dedication to resource recovery through the acquisition of M&M Chemical, a waste processing and container management facility located in Attalla, AL. A year later, Giant acquired the Sumter, SC, waste management and solvent recovery operation previously known as Southeastern Chemical & Solvents, Co. As members of the GCHI family, these facilities are now named **GRR-Attalla** and **GRR-Sumter**.

GRR! grew yet again in 2000 with the opening of **GRR Aerosols, Inc.**, in Arvon, VA. GRR Aerosols offers the unique capability of disposing of waste in aerosol containers by recycling 100% of the components in an innovative closed-loop system. GRR Aerosols expanded and relocated to Attalla, AL, in late 2007. GRR Aerosols handles a greater volume and more types of aerosol waste than any company in North America.

Since its inception, GCHI has developed significant proprietary technology to efficiently utilize solid industrial waste as a reliable fuel source. The Harleyville facility completed an extensive \$130 million expansion in 2005 which maximized the use of solid fuel. In 2009, Keystone completed its \$230 million modernization project. Complemented by GRR's industry-leading ability to process waste into fuel, Giant Cement and Keystone Cement are two of the most advanced cement plants in the United States.

As its history shows, GCHI actively seeks out new technologies and methods of resource recovery and energy recovery. By combining more than 130 years of experience with a demonstrated commitment to environmental stewardship, the GCHI family of companies provides generators with an unparalleled range of safe, reliable, and permanent waste management services.

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## I. About GRR-Attalla

**GRR-Attalla** is located on 296 acres of rural property, 60 miles northeast of Birmingham, AL. GRR-Attalla processes wastes for final disposal, primarily to be burned as a fuel. The facility manages hazardous and non-hazardous materials including liquids, sludges, and solids in bulk and in containers. GRR-Attalla provides the essential link for many wastes that are not suitable for shipment directly to resource recovery kilns. Blended fuels are shipped by rail and tanker truck to RCRA-permitted industrial furnaces such as cement kilns. Any non-blendable hazardous solids are shipped to other permitted facilities for final disposal. Non-hazardous solids are bulked and sent to permitted landfills.

**Fuel blending** is accomplished through the consolidation of drummed and bulk materials in above ground storage tanks. A mix tank is used to liquify sludges and similar semi-solid materials. Once these materials have been recycled into fuel, they can be safely and efficiently burned in cement kilns. This gives both large and small generators the peace of mind that only comes from fuel blending and thermal destruction.



**GRR! Aerosols** is the leading recycler of filled and partially filled Aerosol cans in North America. We have processed more than 165,000,000 pounds of Aerosol cans since 2009. In July of 2024 GRR! completed a significant investment and expansion of our processing facility essentially doubling our recycling capacity. In addition, we have diversified our processing capabilities with the ability to recycle non-aerosol, small containers of flammable liquids. GRR Aerosols recycling technology processes Aerosols into three recyclable components: 1.) Metal, which is sent for recycling, 2.) Fuel-Type propellants utilized as a replacement to Natural Gas in our drum reconditioning operation, and 3.) concentrate liquids which are blended into industrial fuel and utilized as supplemental fuel in the production of Portland Cement. GRR's Aerosol Recycling process is Zero Landfill, providing an immediate impact to our customers Sustainability & Recycling initiatives.

## II. Facility Information

1. **Facility Name:** Giant Resource Recovery–Attalla, Inc.
2. **Location Address:** 1229 Valley Drive  
Attalla, AL 35954
3. **Mailing Address:** 1229 Valley Drive  
Attalla, AL 35954
4. **Web Address:** [www.grr-gchi.us](http://www.grr-gchi.us)
5. **EPA ID #:** ALD070513767
6. **Federal ID #:** 95-2210809
7. **Facility Phone Number:** (800) 637-4023
8. **Facility Established:** 1975
9. **Total Employees:** 75
10. **D & B Rating & Number:** 86-9563304

**11. Facility Contacts:**

Ken Bolcar  
Gulf Coast Commercial Manager  
Phone: (800) 637-4023  
[kbolcar@gchi.com](mailto:kbolcar@gchi.com)

Tina Garrard  
Customer Service Manager  
Phone: (800) 637-4023  
[taelishag@gchi.com](mailto:taelishag@gchi.com)

Kyle Seagraves  
Environmental, Health & Safety Manager  
Phone: (800) 637-4023  
[kseagraves@gchi.com](mailto:kseagraves@gchi.com)

- 12. Under which form of management does the company operate?** Corporation

- 13. SIC Code:** Facility Standard Industrial Classification  
#4953-Refuse Systems

- 14. NAICS Code(s):** 562112 – Hazardous Waste Collection  
562211 – Hazardous Waste Treatment & Disposal

- 15. Classification:** Large Quantity Generator

**16. Previous use of property:**

Prior to 1998 – The operations at the facility have historically consisted of assaying incoming waste solvents for British Thermal Units (BTU) value and operating various filtration units, distillation units, and repackaging facility under the name of M&M Chemical & Equipment Co., Inc.

**17. Facility Operations:**

Fully Permitted TSDF  
Aerosol Propellant Recovery

**18. Surrounding land use:**

North – Agricultural, cattle ranch, residential < 1000 feet

East – Railroad line, Interstate 59, Agricultural Farmland < 4000 feet

West – Residential < 500 feet

South – Railroad line, Interstate 59, Woodlands, Convenience Stores < 1 mile

Residential population within 1 mile of facility: 247

Sensitive Receptors within 3 miles of facility:

<b>Description of Receptor</b>	<b>Direction</b>	<b>Distance from facility</b>
Mountain View Hospital	South	4,000 feet
Wetlands (<5 acres) associated with Little Wills Creek	Southwest	~0.1 mile
Highland Elementary School	East	2 miles

**19. Nearest surface water resources:**

Drainage channel runs northeast to southeast at the facility. GRR–Attalla has three (3) permitted outfalls. The closest point is about 111 feet from any facility operation building.

**20. Is the facility located on or adjacent to wetlands?**

No

**21. Location of nearest drinking water source and type of source:**

The municipal water supply source is the Coosa River, 6.3 miles upstream of the facility.

**22. Is the site within the 100-year flood plain?**

No

**23. Site hydrogeologic information:**

The facility is located in the Cumberland Plateau section of the Appalachian Plateau physiographic province, which is characterized by broad synclinal mountains typically capped by weathering-resistant sandstones of the Pennsylvanian Pottsville Formation (i.e. Lookout Mountain). Intervening valleys (i.e. Big Willis Creek Valley) are predominantly underlain by Cambrian to Ordovician-age carbonates.

The uppermost aquifer beneath the plant is present within the unconsolidated soils. Due to the nature of the parent rock for the saprolitic soils and the depositional nature of overlying sediments, the unconsolidated soils have an interpreted perched water table zone and a lower semi-confined zone. The water table aquifer is present at a depth of approximately 2 to 5 feet below grade, depending on the ground surface elevation. The potentiometric surface for the lower portion of the uppermost aquifer is generally present at a depth of approximately 15 feet below grade, with greater depths observed during periods of low precipitation.

**24. Topography:**

Facility is located at an elevation of approximately 590 feet above mean sea level (MSL)

**25. Hours of operation:**

Operating Hours: Monday-Friday 6:00 AM – 2:30 AM

Receiving Hours: Monday-Friday 6:00 AM – 2:00 PM

**26. Total acres owned:**

296 acres

**27. Are there surface impoundments, incinerators, landfills, waste piles, or deep well injections conducted at this facility?**

No

**28. Are there any superfund sites, old landfills or abandoned plants within ½ mile of the facility?**

No

**29. Are there any closed impoundments at the site?**

No

**30. Is there a general buffer zone around the facility?**

Yes

### **III. Waste Management Practices**

#### **1. Description of facility permitted storage areas and capacity:**

The facility currently has a permitted tank storage capacity of 224,704 gallons including ten (10) 20,000-gallon storage tanks, two (2) 11,700-gallon storage tanks, and one (1) 652-gallon disperser tank with one (1) 652-gallon overflow tank.

Additionally, the facility has two (2) container (roll-off) storage areas (i.e., P-1 and P-2). P-1 has the capacity to store 24 roll-off containers up to 40 cubic yards each (or 12 tanker trucks and/or box trailers), for a permitted storage capacity of 960 cubic yards (193,908 gallons). P-2 has the capacity to store 20 roll-off containers up to 40 cubic yards each (or 10 tanker trucks and/or box trailers), for a permitted storage capacity of 800 cubic yards (161,568 gallons). The total permitted storage capacity of the two (2) container (roll-off) storage areas is 355,476 gallons (1,760 cubic yards). The container storage and receiving area has a permitted storage capacity of 240,240 gallons.

There is also container storage in the aerosol/non-aerosol propellant recovery area (87,450 gallons). The total container storage (permitted) for the site is 683,166 gallons. The total combined permitted storage capacity for the proposed facility of 907,870 gallons (includes capacity of all existing and proposed units).

#### **2. Total annual volume of hazardous waste processed at the facility:**

In 2023, GRR–Attalla received approximately 24,000 tons of hazardous waste.

#### **3. Are wastes permitted to be stored on site for longer than 90 days?**

Yes

#### **4. Containment system used:**

All of GRR–Attalla's permitted storage areas are equipped with an adequate secondary containment system equipped with a compatible and sufficiently impervious coating to meet all regulations.

#### **5. Containers accepted:**

This facility will receive and ship waste only in containers that meet DOT and UN performance-oriented packaging standards (POPS).

**These containers may include, but are not limited to:**

- 55-gallon steel drums
- 55 and 30-gallon polyethylene drums
- 30-gallon steel drums
- 5-gallon steel drums

## **POPS drums containing:**

- Glass vials, plastic vials, to 1 gallon glass or plastic containers
- Up to 30-gallon plastic carboy containers or aerosol cans
- DOT specification roll-off containers
- POPS fiberboard containers
- POPS tote tanks
- POPS tote containers
- DOT specification tankers/trailers

Other containers with approved DOT exemptions

## **6. List major equipment used in process:**

### **• Drum Processing Unit**

The drum processing unit is designed to remove the contents from drums containing liquid and semi-solid type wastes. This process is necessary to allow wastes from various generators to be accumulated in sufficient volume for the purpose of blending these materials into a usable fuel and then bulking the blended fuel into shipments that may be sent to boilers and industrial furnaces.

### **• Solid Fuel Repackaging**

Solid fuel is repackaged by using a variety of mechanical or manual means. GRR may use an on-site hopper by using a loader equipped with a specialized attachment, the drum solids emptier, or other equipment. The loader attachment consists of an auger type device. The solid waste repackaging area is permitted for the treatment of solid waste. Solid fuel is prepared by mixing with an absorbent material at this stage before it is moved to a container storage area

### **• Propellant Recovery System**

The Kruncher™ units at the GRR facility are designed to receive and process containers of liquid, semi-solid, aerosol and non-aerosol cans of hazardous and non-hazardous wastes. The aerosol Krunchers are designed with electrical, hydraulic, gas, and mechanical systems to provide a safe and environmentally sound method of processing aerosol and non-aerosol cans, and their associated contents.

## **7. Accepted Waste Codes**

*See Attachment I - Acceptable Waste Codes*

## **8. Waste Acceptance Criteria:**

GRR processes industrial wastes including but not limited to the following: paints; lacquers; thinners; waste petroleum products; aerosol products; petroleum by-products; inks; resins; adhesives; petroleum distillates; waste solvents (halogenated and non-halogenated); organic chemicals and by-products and various alcohols; and, waste contaminated materials and residues from its waste storage, blending, and processing facility. Waste materials may be delivered to the facility in bulk tanker trucks, rail cars, and containers and either processed, blended, and/or stored in drums or tanks on-site or processed and shipped off-site to an approved facility.

Most, but not all, of the wastes handled at the GRR facility are wastes designated as characteristic or listed as hazardous by U.S. Environmental Protection Agency (EPA) and the State of Alabama. Most are ignitable and some are designated as toxic. However, GRR also occasionally receives used oil and other non-hazardous materials.

## 9. Types of waste not accepted:

### Aerosol Plant:

- Asthmatic/aerosol inhalers with CFC propellants
- D003 Reactives, zinc-based undercoating products
- Adhesives (limited quantities w/ approval)
- Organic cyanides, sulfides, lachrymates, mercaptans
- Silicone gasket-maker products
- Explosive, radioactives
- Expanding foam insulation products
- Chlorofluorocarbon or halofluorocarbon (CFC, FCC, HCF) propellants
- Pepper Spray
- Cylinders (case by case basis w/ approval)
- D002 Corrosives

### Drum Plant:

- Asbestos
- Organic Peroxides
- Cyanide Crystals
- Vinyl Acetate Monomer(>15%)
- Lab Packs
- Chlorofluorocarbons (CFC's)
- Mercaptan
- PCB Material (Any Concentration)
- N,N-Dimethylamine
- Solid Furniture Waste Containing: Nitrocellulose, Glazecoat, Stain, Glaze Filters, Peel Coat or Linseed Oil

Material requiring pre-approval: Please notify GRR–Attalla of any of these items coming into the plant so GRR can track and manage them under our special handling procedures.

- Organic Fiberglass Filters
- Metal Powders (Zinc, Aluminum)
- Accelerators
- Monomers
- Acetonitrile (>5% to 25%)
- Pesticides & Herbicides
- Activators
- Phenol (>10%)
- Acrylonitrile
- Piperazine
- Catalysts
- Piperidine
- Epichlorohydrin (>2%)
- Reducers
- Curing Agent
- Siloxanes/Silanes
- Ethylene Chlorohydrin
- Styrene Monomer
- Foams
- Tetrahydrofuran
- Hardeners
- Urethanes (Containing Isocyanates)
- Household Waste
- UV Ink & Coating
- Isocyanates<sup>1</sup>
- HFC 152A & 134A
- Mercury<sup>2</sup>

<sup>1</sup>Isocyanates will only be received for off-site disposal.

<sup>2</sup>Mercury will only be blended when concentration is < 5 ppm, and up to 10 ppm with special approval.

## **10. Pre-shipment waste acceptance procedure:**

To obtain approval for a new waste stream, the below is required prior to shipment.

- GRR–Attalla Waste Material Profile Form
- Benzene NESHAP Questionnaire
- Credit Application – New Customers only
- TC Rule Certification Form – Non-hazardous only
- Any available analytical data, SDSs, and Product Record Sheets to substantiate and clarify accuracy and facilitate quick approval.

Samples are not required for approval provided the waste is accurately characterized on the profile. However, if the waste material has characteristics that may cause processing problems (such as compatibility, viscosity, etc.), a one-quart representative sample should be submitted. Completed profiles and other information should be mailed or faxed to:

**Approvals**  
**GRR-Attalla – Ken Bolcar**  
**1229 Valley Drive**  
**Attalla, AL 35954**  
**Email: [kbolcar@gchi.com](mailto:kbolcar@gchi.com)**  
**Phone: (256) 215-6716**

## **11. Post-shipment procedures and steps the facility takes to determine whether to accept a particular waste stream:**

Trucks carrying containers will initially check in with site security then proceed to the Plant Office. The inbound shipments will then be directed to the container unloading dock where plant personnel will visually inspect the load, confirm the number of containers, and, on the basis of the documentation and waste identification number, give permission for the load to be unloaded onto the container dock area. During the unloading process, all containers will be inspected, and any container not considered to be in a satisfactory condition will be placed in an overpack drum or other suitable container or designated for immediate processing. Each consignment of containers will be kept separate until approved. When the truck is unloaded, and the manifest signed, the truck may leave the plant.

Containers being unloaded may be placed on the dock or in storage for sampling and verification by fingerprint testing. If it is found that the truckload or a group of containers within a truckload need to be placed in storage for a time before processing, then these containers may be placed in the storage area for up to 24 hours prior to sampling. Containers which have been sampled will be specially marked or place in a designated area in such a manner so as to be readily apparent to plant personnel.

For sampling, GRR shall sample a minimum of 10% of the shipping containers in a shipment. A composite sample will be prepared. The samples will be taken to the laboratory for analysis. The containers will be moved by forklift and be placed in storage or processed. If a container or group of containers does not conform to the profile sheet and upon review it is determined that the waste is unsuitable for processing, then the containers will be removed from storage and placed into a reject container area.

If discrepancies are noted GRR will contact the generator within 24 hours and describe the discrepancy. The generator is allowed 24 hours to:

- 1) revise the profile,
- 2) correct the manifest, or
- 3) make arrangements to remove the waste or have it shipped to an alternate facility.

If revisions are necessary, the generator may email the corrected document(s).

## **12. Description of sampling procedures:**

### **Bulk Shipments**

Sampling of tanker trucks and rail car bulk shipments is accomplished by using the Coliwasa sampler method.

### **Containers (Drums)**

Samples from drums, e.g., 55-gallon drums and smaller containers, are taken with a tube or pipe similar to a Coliwasa sampler. The pipe is made of non-sparking material such as copper or plastic and has an inside diameter of about  $\frac{1}{2}$  to  $\frac{5}{8}$ ". This provides a much sturdier tool for sampling and has proven to be an adequate sampling device even under adverse sampling conditions.

### **Solids**

Solids that are non-penetrable may be sampled with an auger, by chipping, by scrapping or by tearing or breaking off a piece.

### **Aerosol Can Containers**

Aerosol wastes in containers do not require incoming shipment sampling and testing (fingerprint analysis) prior to processing the aerosol wastes in the Kruncher™ unit due to the potential difficulty of sampling and analysis of the aerosol waste streams, the facility's preacceptance procedures, and the design and operation of the Kruncher units (inerting and fire and safety systems). Shipments of aerosol containers will be inspected upon unloading to verify that the contents of the shipment match the waste material profile. Then, sampling of each shipment can occur one of two ways:

- a. The liquid waste stream separated by the Kruncher unit is sampled and tested by the incoming waste shipment verification procedures and waste compatibility testing prior to mixing with other wastes in the tank storage system, a fingerprint sample (liquid/semi-solid waste) from each shipment of aerosol waste is collected from a sampling port associated with the Kruncher unit.
- b. An aerosol can emptying device can be used to puncture the can and collect a sample of the liquid/semi-solid component, This is done prior to the introduction of the aerosol cans to the Kruncher.

Shipping containers containing aerosol containers to be processed in the Kruncher unit shall be sampled on the same frequency as detailed above. A representative number of individual cans may be manually selected from each bulk container and a portion of the liquid/solid contents will be used to form a composite sample for each shipment. Again, no samples of the propellant gases for aerosol cans will be obtained. As an alternative to forming a composite sample from a representative group of individual cans, samples may be collected from the Kruncher itself after the containers have been processed and prior to placing any liquid or solids wastes in storage. However, all wastes processed in the Kruncher™ unit are screened for waste compatibility prior to mixing and processing with other wastes. Collecting samples in this manner will minimize worker exposure to solvents and ensure that a representative sample of each shipment is obtained. Any waste not matching the profile or manifest will be identified as part of shipment receipt inspection procedures.

**13. Sampling equipment used:**

Coliwasa (liquids), Auger (solids)

**31. Onsite laboratory capabilities:**

Equipment used in the on-site lab includes Bomb Calorimeter, pH meter, Titrator, GC-ECDs, Geiger Counter, Flash Tester, Digital Scales. The lab maintains detailed analytical records.

**14. Underground storage tanks. Above ground storage tanks.**

None 12

**15. Permitted capacity of the storage tanks:**

Bulk Storage and Treatment Tanks – 223,400 gallons

Process Treatment Tank – 1 unit – 1,304 gallons

Total Storage and Treatment Tank Capacity – 224,704 gallons

**16. Material of which the tanks are constructed:**

Carbon Steel

**17. Does the facility conduct integrity assessment of tanks?**

Yes. Tank thickness testing is performed annually.

**18. Are tanks permitted or registered with the proper agency?**

Yes

**19. How is the waste managed while awaiting the results of checking and/or laboratory analysis?**

Waste is placed in a staging/storage area until analytical results are completed. If a container or group of containers does not conform to the profile sheet and upon review it is determined that the waste is unsuitable for processing, then the containers will be removed from storage and placed into a reject container area. If approved, it will await processing.

**20. Are waste separated to prevent potential reactions from occurring between incompatible wastes?**

Yes, this is done by physical separation and secondary containment pallet when necessary.

**21. Explain how waste is tracked while onsite:**

*See Attachment II - Simplified Process Flow Schematic*

**22. How are wastes screened to ensure compliance with land disposal restrictions?**

During profiling and receiving process

**23. What residual products are generated?**

Lab waste, PPE waste and clean-up materials. These materials are fuel blended into our outbound fuel. Lab sample waste also goes into outbound fuel.

**24. What limits are placed on wastes and containers which would cause them to be returned to the generator?**

Nonconforming waste containing permit prohibited components.

**25. Description on how rejected material will be handled:**

Rejected materials are directed to an alternate approved facility or rejected back to the generator. The generator is immediately notified, and disposal is agreed on by both parties.

**26. What happens to empty containers?**

RCRA empty metal containers are processed on-site through the facility's Drum and Lid Furnace with Afterburner. After going through the furnace, RCRA empty metal containers are crushed and sent off-site as scrap metal. Additionally fiber/plastic containers, that arrive at the facility are sent for recycling.

**27. What methods are used to ensure waste containers are RCRA empty?**

Visual inspection, scraping, pouring, and draining are some of the methods used to ensure RCRA empty containers.

**28. Describe how residuals "heels" from bulk truck/tankers are managed:**

If a bulk tanker is not RCRA empty and GRR is unable to remove the remaining residuals and there is a variation greater than 10 percent in weight from what was manifested to what is remaining on the tanker, GRR will reject the remaining residue back to the generator or to an alternate facility.

**29. Description of emission vents and controls in container processing (includes % of efficiency for controls):**

GRR currently does not operate any emission vents or control devices in its container processing area. Storage tanks are equipped with emergency vents, conservative vents, and flame arrestors and comply with Level 1 Controls under Subpart CC.

**30. What operational parameters are monitored and how often?**

**Continuous Monitoring:**

- LEL in the Kruncher Warehouse and Processing Buildings
- Carbon Unit on two Kruncher units
- Tank level indicators

**31. Are there any permit conditions related to whom the waste-derived fuel may be shipped?**

No, generally, waste derived fuel is shipped to any audited and pre-approved cement kilns permitted to accept and burn waste derived fuel. Giant owns two kilns and uses those facilities as much as possible.

**32. Are there any compositional specifications that the waste-derived fuel must meet under the facility's permit?**

No, only the specifications stipulated by the kilns.

**33. Describe the system for regulatory recordkeeping and manifest monitoring:**

Records are kept in accordance with regulatory recordkeeping requirements for different programs (RCRA, CAA, NPDES). Manifests (inbound and outbound) are reviewed by several departments.

## IV. Environmental and Regulatory Compliance

### 1. Reported spills at the site within the last 5 years:

No reported spills at the site within the last 5 years.

### 2. RCRA corrective actions presently being undertaken or proposed:

Yes

### 3. Are spills or leaks evident?

No. Should evidence of a spill or leak be observed during daily RCRA inspections, the facility will complete spill and/or leak cleanup within a 24-hour time limit.

### 4. Environmental Permits

#### EPA ID No. ALD070513767

RCRA Part B Permit for treatment and storage; originally issued 10/2/1995 and Expires 8/28/2027

#### Air Permit No. 307-0019-X006 through 307-0019-X012

Includes all applicable MACT requirements; Issued 2/1/2006. No expiration-Continuous

#### NPDES Permit No. AL0054542

Issued most recently on 7/24/2023. Expires 7/31/2028

*See Attachment III - Permit Cover Letters*

### 5. Environmental Regulatory Officials:

Agency	Title/Division	Point of Contact	Telephone Number	Email
ADEM	RCRA Compliance Inspector – Land Division – Hazardous Waste Inspector	Corey Holms	(334) 271-7852	<a href="mailto:cholmes@adem.state.al.us">cholmes@adem.state.al.us</a>
ADEM	Inspector – Air Program	Paul Contorno	(334) 271-7761	<a href="mailto:paul.contorno@adem.alabama.gov">paul.contorno@adem.alabama.gov</a>
ADEM	Environmental Engineering Specialist – NPDES Individual Permits	Rachel Lounsberry	(334) 279-3065	<a href="mailto:rlounsberry@adem.state.al.us">rlounsberry@adem.state.al.us</a>
ADEM	RCRA Permit Engineer	Tamaria McAlpin	(334) 274-4188	<a href="mailto:TMcAlpin@adem.alabama.gov">TMcAlpin@adem.alabama.gov</a>

### 6. Site currently under any compliance agreement or other enforcement action:

Yes. Details are available upon request.

### 7. Environmental lawsuits within the past 2 years:

No

### 8. Monitoring wells on the property:

Yes, 25 monitoring wells on the property.

**9. Is groundwater monitoring currently being performed?**

Yes, Facility conducts semi-annual monitoring.

**10. Has monitoring indicated groundwater contamination?**

Historical contamination is being remediated and monitored as noted above.

**11. How is run-off of stormwater from the facility prevented?**

The container storage and processing site and surrounding area is graded and ditched, and the building is designed with an overhang to manage precipitation run off from entering the building. Our experience has shown that run-on is not a problem, and that precipitation normally does not blow into the storage and processing areas. If precipitation is blown into these areas in amounts that won't evaporate readily, it will be cleaned up and managed accordingly.

**12. How is stormwater falling on active portions of the site collected?**

Stormwater falling on active portions of the site is collected within 24 hours and processed or managed in accordance with facility permits.

**13. How does the facility dispose of its wastewater?**

Wastewater is collected and processed on-site.

**14. Are there any stacks, fugitive emissions, and stationary emission sources, or air pollution control systems within the control of this facility?**

Yes, the facility's aerosol operations include two stacks both under Synthetic Minor Operating Permit – Drum and Lid Furnace with Afterburner and Bypass. Additionally, the facility is equipped with two emergency fire pump engines which also have a Synthetic Minor Operating Permit. All the facility's ASTs comply with Level 1 Controls under Subpart CC. All containers on-site remain closed unless actively adding or removing and comply with Level 1 or 2 Controls under Subpart CC.

**15. Pollution Control Devices used at the facility:**

Two aerosol/non-aerosol can processing units have a carbon adsorption system

**16. Does GRR-Attalla conduct self-audits?**

Yes. Daily, weekly, monthly, and annual inspections are conducted by on-site personnel in compliance with the Inspection Plan contained in GRR-Attalla's RCRA Part B permit. With regard to the tank farm, the following are performed: leak detection inspections in compliance with Subpart BB, tank controls inspections in compliance with Subpart CC, and annual tank thickness inspections in compliance with the RCRA permit. Fire equipment is inspected monthly, quarterly, and annually - per the Fire Code and in accordance with the facility's RCRA permit. In addition, quarterly inspections are performed by corporate health and safety, industrial hygiene, and environmental compliance personnel.

**17. How often are regulatory agency audits conducted and by whom?**

GRR-Attalla participates in regular as well as unannounced environmental compliance audits by state and federal regulatory authorities responsible for RCRA compliance, air quality, and NPDES monitoring. Outside consultants are also contracted to inspect the facility from time to time. GRR's insurance carriers may also perform inspections. All inspections and follow-up are documented.

## V. Safety and Security

### 1. Protective equipment used:

All GRR facility operations personnel are thoroughly trained in the proper procedures for handling hazardous waste, performing facility operations, and responding to emergency situations. Each employee is informed and aware of all potential hazards, observes prescribed safety precautions, and follows good work habits. Each employee is issued a hard hat, safety glasses, chemical resistant gloves, and must wear safety toe shoes in the production areas. In addition, safety shields, safety goggles, respirators, protective clothing, and other safety items are provided to and worn by appropriate personnel.

### 2. Safety showers and eye washes available in work areas:

Yes, safety showers and eye wash stations are located throughout the facility.

### 3. Adequate fire safety equipment if available. Type of equipment (hydrants, foam/chemical extinguishers, sprinklers, etc.)

Yes, GRR maintains an existing fire suppression system for the container storage and all processing areas. Fire hydrants are strategically located throughout the facility to provide means for a suitable response. The facility's source of water for the fire extinguishing systems is the retention pond located southwest of the facility. The facility maintains two pumps, a primary and a back-up, to supply water in the event of a fire. Water systems for firefighting purposes at the facility have been designed with adequate capacity pursuant to established applicable standards. Additionally, GRR maintains hand-held fire extinguishers, wheeled extinguishing units, and other life safety equipment.

### 4. Describe the facility's emergency response programs:

The facility's Contingency Plan describes the locations and capabilities of the emergency equipment available at or near the GRR facility. This equipment includes internal and external communications, as well as fire, spill control, and clean-up equipment. GRR intends to rely on the local fire department to fight any fires that GRR personnel cannot fight effectively with hand-held fire extinguishers or by means of the fire suppression systems.

### 5. Agencies which have emergency response agreements with the site:

Attalla Fire and Rescue  
Reece City Volunteer Fire Department  
Etowah County Sheriff's Department  
Gadsden Regional Medical Center  
Gadsden/Etowah County Emergency Management Agency

### 6. Site emergencies in the last year:

None

### 7. OSHA rating for the last 5 years:

	<u>2019</u>	<u>2020</u>	<u>2021</u>	<u>2022</u>	<u>2023</u>
Total man hours worked:	124,155	135,076	142,223	147,865	166,728
Recordable Incidence Rate:	0.00	1.48	2.81	2.71	8.40
Lost Time Frequency Rate:	0.00	1.48	0.00	0.00	0.00

**8. Types of medical monitoring conducted for employees:**

Pre-employment physicals  
Annual physicals

**9. Content of training program:**

Training is administered in three phases:

1. Initial overall training
2. Initial job-specific training
3. Continuing re-training

GRR's training program incorporates OSHA, DOT and EPA requirements and is outlined in Section 7 of its RCRA Part B Permit Application.

## **VI. Financial/Insurance Data**

### **1. Insurance**

*See Attachment IV - Certificate of Insurance*

### **2. Financial assurance for facility closure:**

*See Attachment V - Closure Cost Estimate*

### **3. Total Closure Cost Estimates:**

**\$3,299,753 Updated 2024**

In accordance with RCRA, GRR-Attalla's permit contains a Closure Plan that has been written to outline the procedures necessary to completely close GRR's hazardous waste operations at the end of their intended operating life, leaving the facility in an uncontaminated condition suitable for other uses by GRR or other parties. This includes:

- 1) All waste removed
- 2) Hazardous waste units fully decontaminated
- 3) Inspection of tanks/containers and processing and storage facilities for any hazardous residue
- 4) Certification of completion of Closure by GRR-Attalla and by an independent registered professional engineer

### **4. What is GRR-Attalla's policy on indemnification of clients?**

Customer warrants that the waste customer ships to GRR! will meet waste fuel specifications and will not contain PCB's, dioxins, cyanides, lachrymates, mercaptans, insecticides, listed pesticides, herbicides, or other toxic, explosive, corrosive, or radioactive materials not identified on the Waste Profile. In the event that testing costs, damages, fines, or other costs or liabilities are incurred as the result of the customer or generator shipping out-of-specification waste or unacceptable materials, the customer agrees to indemnify, defend and hold harmless the transporter and GRR!

**Service Provider Indemnification:** As long as the Waste supplied by Customer conform to the specifications set forth in the respective Waste Profile, Service Provider shall indemnify, hold harmless and defend Customer, its subsidiaries and the present and future officers, directors, employees and agents of Customer and its subsidiaries from and against such civil penalties, fines, claims, losses, damages and causes of action, including costs of defense, settlement and attorney's fees (collectively, "Losses") as may be brought on account of death or bodily injury to any person, destruction or damage to any property, injury to, destruction of or loss of natural resources or any violation of any federal or state law, regulation or municipal ordinance, and which result from or arise out of Service Provider's negligence, willful misconduct, breach of warranty or failure to perform services in accordance with this Agreement.

**Customer Indemnification:** Customer shall indemnify, hold harmless and defend Service Provider, its parents, subsidiaries and related companies, and each of their respective present and future officers, directors, employees, and agents from such Losses as may be brought on account of death or bodily injury to any person, destruction or damage to any property, injury to, destruction of or loss of natural resources or any violation of any federal or state law, regulation or municipal ordinance, and which result from or arise out of Customer's (or Customer's agents') negligence, willful misconduct or breach of warranty, delivery to Service Provider (or its subcontractor) Nonconforming Waste by or through Customer or failure of Customer to perform its responsibilities under this Agreement.

## VII. Giant Resource Recovery Facilities

### **Keystone Cement Co.**

Bath, PA

Blends and burns bulk liquid waste derived fuel in the manufacture of Keystone cement

### **GRR–Sumter, Inc.**

Sumter, SC

Processes containerized and bulk liquids, solids, and sludges

### **GRR–Harleyville, Inc.**

Harleyville, SC

Blends and burns bulk solid and liquid waste-derived fuel in the manufacture of Giant cement

### **GRR–Attalla, Inc.**

Attalla, AL

Processes containerized and bulk liquids, solids, and sludges

### **GRR Aerosols, Inc.**

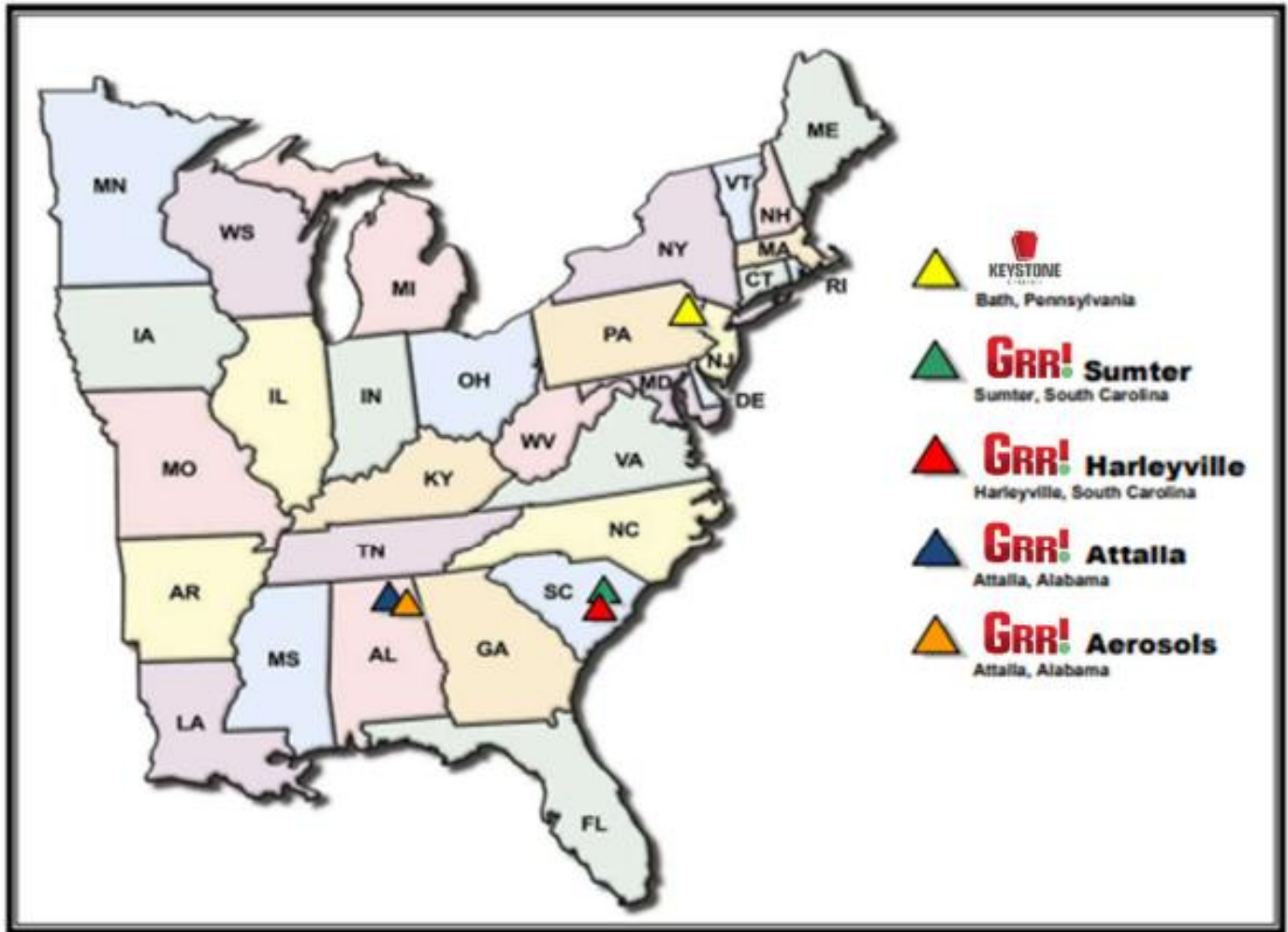
Attalla, AL

Disposes of waste in aerosol cans through 100% recycling; processes steel drums for reconditioning





## The **Giant Resource Recovery** Facilities



**Resource Recovery and Energy Reutilization**

**Safe, Reliable, Permanent**

## **VIII. Facility Maps/Layout**

*See Attachment VI – Facility Drawing*

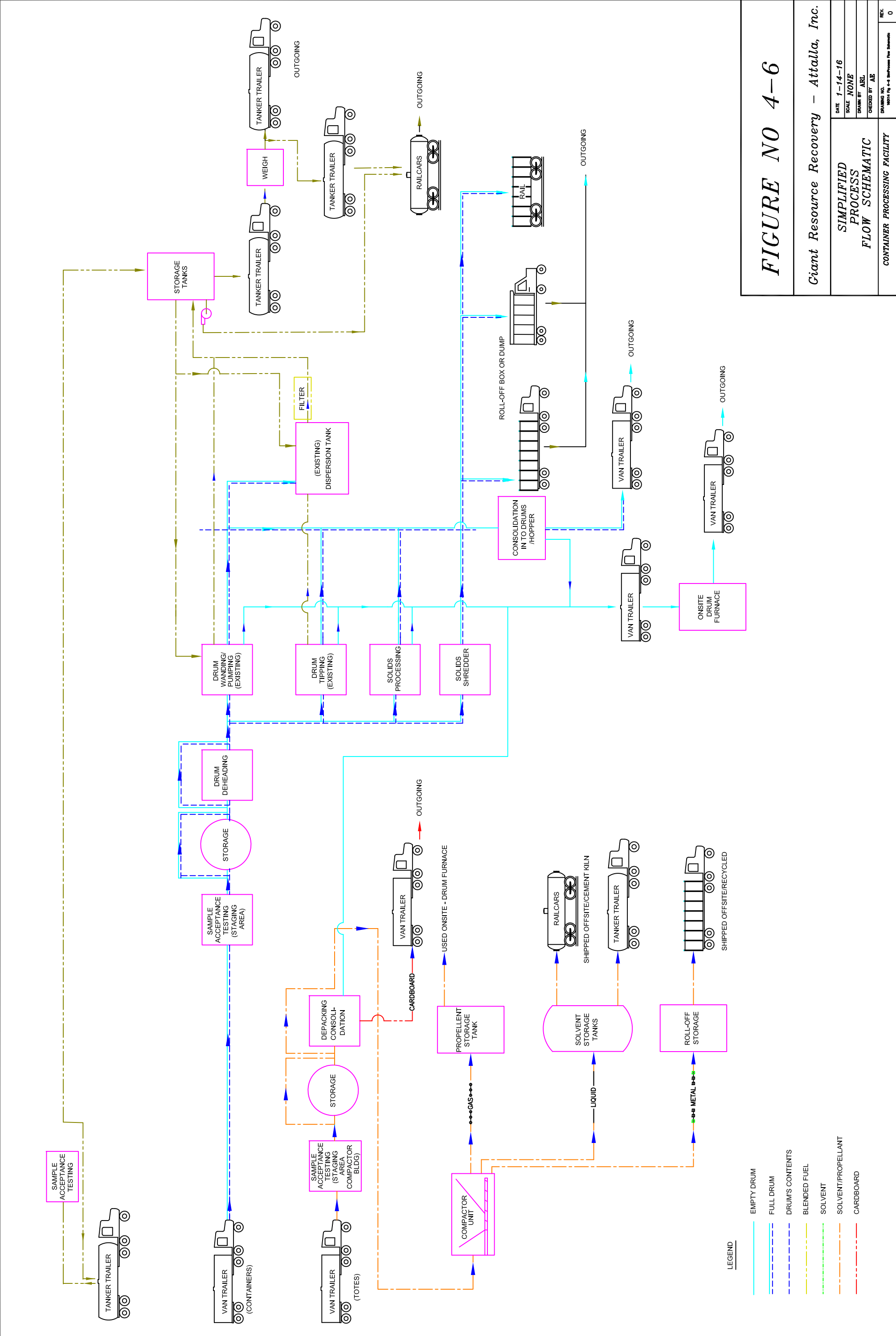
**Permitted Waste Codes****GRR-Attalla**

Approved waste codes for bulk liquid fuels and fuel blendable material in drums:

D001	F001	K001	K087	P001	U001	U053	U105	U149	U203
D002	F002	K002	K088	P006	U002	U055	U106	U150	U204
D004	F003	K003	K093	P022	U003	U056	U107	U151	U205
D005	F004	K004	K094	P028	U004	U057	U108	U152	U207
D006	F005	K005	K095	P029	U005	U063	U109	U153	U208
D007	F006	K006	K096	P030	U006	U066	U110	U154	U209
D008	F007	K007	K100	P050	U007	U067	U111	U155	U210
D009	F008	K008	K101	P064	U008	U068	U112	U156	U211
D010	F009	K009	K102	P074	U009	U069	U113	U157	U213
D011	F010	K010	K103	P075	U010	U070	U114	U158	U214
D012	F011	K011	K104	P098	U011	U071	U115	U159	U215
D013	F012	K013	K105	P105	U012	U072	U116	U161	U216
D014	F024	K014	K114	P106	U014	U073	U117	U162	U217
D015	F032	K015	K115	P120	U015	U074	U118	U163	U218
D016	F034	K016	K141		U016	U075	U119	U164	U219
D017	F035	K017	K142		U017	U076	U120	U165	U220
D018	F037	K018	K143		U018	U077	U121	U166	U221
D019	F038	K019	K144		U019	U078	U122	U167	U222
D020	F039	K021	K145		U020	U079	U123	U168	U223
D021		K022	K147		U021	U080	U124	U169	U225
D022		K023	K148		U022	U081	U125	U170	U226
D023		K024	K156		U023	U082	U126	U171	U227
D024		K025	K157		U024	U083	U127	U172	U228
D025		K026	K158		U025	U084	U128	U174	U235
D026		K027	K159		U026	U085	U129	U179	U236
D027		K028	K161		U027	U086	U130	U180	U237
D028		K029	K169		U028	U087	U131	U181	U238
D029		K030	K170		U029	U088	U132	U182	U239
D030		K035	K171		U030	U089	U133	U183	U240
D031		K046	K172		U031	U090	U134	U184	U243
D032		K048			U032	U091	U136	U185	U244
D033		K049			U036	U092	U137	U186	U247
D034		K050			U037	U093	U138	U187	U328
D035		K051			U039	U094	U140	U188	U359
D036		K052			U043	U095	U141	U190	U367
D037		K060			U044	U096	U142	U191	
D038		K061			U045	U097	U143	U192	
D039		K062			U047	U098	U144	U193	
D040		K083			U048	U099	U145	U194	
D041		K084			U050	U101	U146	U196	
D042		K085			U051	U102	U147	U200	
D043		K086			U052	U103	U148	U201	

Approved waste codes for solids to be bulked and shipped to Giant Cement:

D001	F001	K001	K087	P001	U001	U053	U105	U149	U202
D002	F002	K002	K088	P006	U002	U055	U106	U150	U203
D004	F003	K003	K093	P022	U003	U056	U107	U151	U204
D005	F004	K004	K094	P028	U004	U057	U108	U152	U205
D006	F005	K005	K095	P029	U005	U063	U109	U153	U207
D007	F006	K006	K096	P030	U006	U066	U110	U154	U208
D008	F007	K007	K100	P050	U007	U067	U111	U155	U209
D009	F008	K008	K101	P053	U008	U068	U112	U156	U210
D010	F009	K009	K102	P055	U009	U069	U113	U157	U211
D011	F010	K010	K103	P064	U010	U070	U114	U158	U212
D012	F011	K011	K104	P074	U011	U071	U115	U159	U213
D013	F012	K013	K105	P075	U012	U072	U116	U161	U214
D014	F024	K014	K114	P098	U014	U073	U117	U162	U215
D015	F032	K015	K115	P105	U015	U074	U118	U163	U216
D016	F034	K016	K141	P106	U016	U075	U119	U164	U217
D017	F035	K017	K142	P120	U017	U076	U120	U165	U218
D018	F037	K018	K143	P127	U018	U077	U121	U166	U219
D019	F038	K019	K144	P189	U019	U078	U122	U167	U220
D020	F039	K021	K145		U020	U079	U123	U168	U221
D021		K022	K147		U021	U080	U124	U169	U222
D022		K023	K148		U022	U081	U125	U170	U223
D023		K024	K156		U023	U082	U126	U171	U225
D024		K025	K157		U024	U083	U127	U172	U226
D025		K026	K158		U025	U084	U128	U174	U227
D026		K027	K159		U026	U085	U129	U179	U228
D027		K028	K161		U027	U086	U130	U180	U230
D028		K029	K169		U028	U087	U131	U181	U231
D029		K030	K170		U029	U088	U132	U182	U232
D030		K035	K171		U030	U089	U133	U183	U235
D031		K046	K172		U031	U090	U134	U184	U236
D032		K048			U032	U091	U136	U185	U237
D033		K049			U036	U092	U137	U186	U238
D034		K050			U037	U093	U138	U187	U239
D035		K051			U039	U094	U140	U188	U240
D036		K052			U043	U095	U141	U190	U242
D037		K060			U044	U096	U142	U191	U243
D038		K061			U045	U097	U143	U192	U244
D039		K062			U047	U098	U144	U193	U247
D040		K083			U048	U099	U145	U194	U328
D041		K084			U050	U101	U146	U196	U359
D042		K085			U051	U102	U147	U200	U367
D043		K086			U052	U103	U148	U201	





# HAZARDOUS WASTE FACILITY PERMIT

**PERMITTEE:** GIANT RESOURCE RECOVERY –  
ATTALLA, INC.

**ADDRESS:** 1229 VALLEY DRIVE  
ATTALLA, AL 35954

**PERMIT NUMBER:** ALD 070 513 767

**UNITS PERMITTED:** STORAGE IN CONTAINERS  
STORAGE AND TREATMENT IN TANKS

**ISSUANCE DATE:** August 29, 2017  
September 29, 2020      Modification 1- Minor  
August 19, 2022      Modification 2- Major  
January 16, 2024      Modification 3- Minor

**EFFECTIVE DATE:** August 29, 2017

**EXPIRATION DATE:** August 28, 2027

*This Permit is issued pursuant with the Code of Alabama 1975, §§ 22-30-1-et. seq., as amended, and regulations adopted thereunder and the Hazardous Wastes Management and Minimization Act and in accordance with the plans and specifications and applications filed with the Department subject to the conditions appended hereto, all of which are considered a part of this Permit. This Permit shall be subject to all applicable laws of the State of Alabama, rules and regulations and orders of the Department of Environmental Management and shall be effective from the date of issuance.*

A handwritten signature in black ink, appearing to read "Jeffrey A. Call", is positioned above the department name.

---

Alabama Department of Environmental Management



# NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM PERMIT

**PERMITTEE:** GIANT RESOURCE RECOVERY - ATTALLA INC.

**FACILITY LOCATION:** GIANT RESOURCE RECOVERY - ATTALLA INC.  
1229 VALLEY DRIVE  
ATTALLA, ALABAMA 35954  
ETOWAH COUNTY

**PERMIT NUMBER:** AL0054542

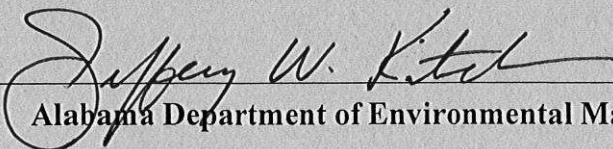
**RECEIVING WATERS:** LITTLE WILLS CREEK

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

**ISSUANCE DATE:** JULY 24, 2023

**EFFECTIVE DATE:** AUGUST 1, 2023

**EXPIRATION DATE:** JULY 31, 2028

  
\_\_\_\_\_  
Alabama Department of Environmental Management

**ADEM**

ALABAMA  
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT



## AIR PERMIT

**PERMITTEE:** GIANT RESOURCE RECOVERY – ATTALLA, INC.

**LOCATION:** ATTALLA, ALABAMA

**PERMIT NUMBER**

307-0019-X006

**DESCRIPTION OF EQUIPMENT,  
ARTICLE OR DEVICE**

Storage Tank R 1 (12,000 gallons)

*In accordance with and subject to the provisions of the Alabama Air Pollution Control Act of 1971, as amended, Code of Alabama 1975, §§22-28-1 to 22-28-23 (the "AAPCA") and the Alabama Environmental Management Act, as amended, Code of Alabama 1975, §§22-22A-1 to 22-22A-15, and rules and regulations adopted thereunder, and subject further to the conditions set forth in this permit, the Permittee is hereby authorized to construct, install and use the equipment, device or other article described above.*

**ISSUANCE DATE:** February 1, 2006

A handwritten signature in dark ink, appearing to be "Brett C. [unclear]", is written over a horizontal line.

Alabama Department of Environmental Management

**ADEM**

ALABAMA  
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT



## AIR PERMIT

**PERMITTEE:** GIANT RESOURCE RECOVERY – ATTALLA, INC.

**LOCATION:** ATTALLA, ALABAMA

**PERMIT NUMBER**

307-0019-X007

**DESCRIPTION OF EQUIPMENT,  
ARTICLE OR DEVICE**

Storage Tank R 2 (12,000 gallons)

*In accordance with and subject to the provisions of the Alabama Air Pollution Control Act of 1971, as amended, Code of Alabama 1975, §§22-28-1 to 22-28-23 (the "AAPCA") and the Alabama Environmental Management Act, as amended, Code of Alabama 1975, §§22-22A-1 to 22-22A-15, and rules and regulations adopted thereunder, and subject further to the conditions set forth in this permit, the Permittee is hereby authorized to construct, install and use the equipment, device or other article described above.*

**ISSUANCE DATE:** February 1, 2006

A handwritten signature in black ink, likely of the official representing the Alabama Department of Environmental Management, is positioned above the department's name.

Alabama Department of Environmental Management

**ADEM**

ALABAMA  
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT



## AIR PERMIT

PERMITTEE: GIANT RESOURCE RECOVERY – ATTALLA, INC.

LOCATION: ATTALLA, ALABAMA

PERMIT NUMBER

307-0019-X008

DESCRIPTION OF EQUIPMENT,  
ARTICLE OR DEVICE

Storage Tank R 3 (12,000 gallons)

*In accordance with and subject to the provisions of the Alabama Air Pollution Control Act of 1971, as amended, Code of Alabama 1975, §§22-28-1 to 22-28-23 (the "AAPCA") and the Alabama Environmental Management Act, as amended, Code of Alabama 1975, §§22-22A-1 to 22-22A-15, and rules and regulations adopted thereunder, and subject further to the conditions set forth in this permit, the Permittee is hereby authorized to construct, install and use the equipment, device or other article described above.*

ISSUANCE DATE: February 1, 2006

A handwritten signature in black ink, appearing to read "R. M. ...", is written over a horizontal line.

Alabama Department of Environmental Management

**ADEM**

ALABAMA  
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT



## AIR PERMIT

**PERMITTEE:** GIANT RESOURCE RECOVERY – ATTALLA, INC.

**LOCATION:** ATTALLA, ALABAMA

**PERMIT NUMBER**

307-0019-X009

**DESCRIPTION OF EQUIPMENT,  
ARTICLE OR DEVICE**

Storage Tank R 4 (12,000 gallons)

*In accordance with and subject to the provisions of the Alabama Air Pollution Control Act of 1971, as amended, Code of Alabama 1975, §§22-28-1 to 22-28-23 (the "AAPCA") and the Alabama Environmental Management Act, as amended, Code of Alabama 1975, §§22-22A-1 to 22-22A-15, and rules and regulations adopted thereunder, and subject further to the conditions set forth in this permit, the Permittee is hereby authorized to construct, install and use the equipment, device or other article described above.*

**ISSUANCE DATE:** February 1, 2006

A handwritten signature in black ink, appearing to read "P. W. For", is written over a horizontal line.

Alabama Department of Environmental Management

**ADEM**

ALABAMA  
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT



## AIR PERMIT

**PERMITTEE:** GIANT RESOURCE RECOVERY – ATTALLA, INC.

**LOCATION:** ATTALLA, ALABAMA

**PERMIT NUMBER**

307-0019-X010

**DESCRIPTION OF EQUIPMENT,  
ARTICLE OR DEVICE**

Storage Tank S & T(#1-#8) (20,000 gallons)

*In accordance with and subject to the provisions of the Alabama Air Pollution Control Act of 1971, as amended, Code of Alabama 1975, §§22-28-1 to 22-28-23 (the "AAPCA") and the Alabama Environmental Management Act, as amended, Code of Alabama 1975, §§22-22A-1 to 22-22A-15, and rules and regulations adopted thereunder, and subject further to the conditions set forth in this permit, the Permittee is hereby authorized to construct, install and use the equipment, device or other article described above.*

**ISSUANCE DATE:** February 1, 2006

A handwritten signature in dark ink, likely of the official representing the Alabama Department of Environmental Management, is positioned above the department's name.

Alabama Department of Environmental Management

**ADEM**

ALABAMA  
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT



## AIR PERMIT

**PERMITTEE:** GIANT RESOURCE RECOVERY – ATTALLA, INC.

**LOCATION:** ATTALLA, ALABAMA

**PERMIT NUMBER**

307-0019-X011

**DESCRIPTION OF EQUIPMENT,  
ARTICLE OR DEVICE**

Storage Tank S & T(#9-#16) (20,000 gallons)

*In accordance with and subject to the provisions of the Alabama Air Pollution Control Act of 1971, as amended, Code of Alabama 1975, §§22-28-1 to 22-28-23 (the "AAPCA") and the Alabama Environmental Management Act, as amended, Code of Alabama 1975, §§22-22A-1 to 22-22A-15, and rules and regulations adopted thereunder, and subject further to the conditions set forth in this permit, the Permittee is hereby authorized to construct, install and use the equipment, device or other article described above.*

**ISSUANCE DATE:** February 1, 2006

A handwritten signature in dark ink, appearing to read "D. W. Brown", is written over a horizontal line.

Alabama Department of Environmental Management

ONIS "TREY" GLENN, III  
DIRECTOR

APR 17 2007



BOB RILEY  
GOVERNOR

Alabama Department of Environmental Management  
adem.alabama.gov  
1400 Coliseum Blvd. 36110-2059 \* Post Office Box 301463  
Montgomery, Alabama 36130-1463  
(334) 271-7700  
FAX (334) 271-7950

April 12, 2007

Mr. W. Cecil Hopper  
Corporate Manager, Environmental Compliance  
Giant Resource Recovery - Attalla, Inc.  
1229 Valley Drive  
Attalla, AL 35954

RE: Permit Exemption Request

Dear Mr. Hopper:

We have examined your March 26, 2007, application for an Air Permit determination. Based on this information, your facility's potential to emit will be below the Title V Major Source Thresholds; therefore, your facility will be considered a minor source. Additionally, ADEM has determined that no state or federal emission standards are expected to be exceeded. Therefore, registration in this agency's Air Permitting system will not be required at this time.

If in the future, your facility's emissions rate increases, new process are added, or any complaints are received a re-evaluation will be made. Your cooperation is greatly appreciated. If you have any questions concerning this matter please contact Aaron Schilke at (334)270-5671 in Montgomery.

Sincerely,

Larry W. Brown, Chief  
Chemical Branch  
Air Division

LWB/AS: sat

*file - original*

*J. Ken  
D. Jackson  
V. Leith  
C. Hopper  
S. Holt  
S. Ray*

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

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

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

Mobile - Coastal  
4171 Commanders Drive  
Mobile, AL 36615-1421  
(251) 432-6533  
(251) 432-6598 (Fax)

DEC 15 2008



## SYNTHETIC MINOR OPERATING PERMIT

PERMITTEE: GRR - ATTALLA INC.  
FACILITY NAME: GRR - ATTALLA INC.  
LOCATION: ATTALLA, AL

PERMIT NUMBER	DESCRIPTION OF EQUIPMENT, ARTICLE OR DEVICE
307-0019-X012	Drum and Lid Furnace with Afterburner and Bypass

*In accordance with and subject to the provisions of the Alabama Air Pollution Control Act of 1971, as amended, Ala. Code §§22-28-1 to 22-28-23 (2006 Rplc. Vol. and 2007 Cum. Supp.) (the "AAPCA") and the Alabama Environmental Management Act, as amended, Ala. Code §§22-22A-1 to 22-22A-15 (2006 Rplc. Vol. and 2007 Cum. Supp.), and rules and regulations adopted there under, and subject further to the conditions set forth in this permit, the Permittee is hereby authorized to construct, install and use the equipment, device or other article described above.*

ISSUANCE DATE: December 9, 2008

Alabama Department of Environmental Management

LANCE R. LEFLEUR  
DIRECTOR



ROBERT J. BENTLEY  
GOVERNOR

Alabama Department of Environmental Management  
adem.alabama.gov

1400 Coliseum Blvd. 36110-2400 ■ Post Office Box 301463  
Montgomery, Alabama 36130-1463  
(334) 271-7700 ■ FAX (334) 271-7950

September 9, 2015

Mr. Patrick Nolan  
Environmental Manager  
GRR  
1229 Valley Drive  
Attalla, AL 35954

RE: **Authorization to Operate**  
**Permit Number 307-0019-X013**

Dear Mr. Nolan:

On July 31, 2015, Giant Resource Recovery was issued Synthetic Minor Operating Permit 307-0019-X013 for two fire pump engines. On September 1, 2015, a representative of the Department inspected the unit and observed it to have been constructed in accordance with the application, and to be capable of operating in compliance with its permit conditions.

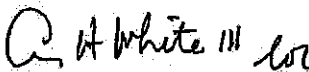
Therefore, Authorization to Operate is granted for the following unit(s):

<u>Permit No.</u>	<u>Description</u>
307-0019-X013	1. Caterpillar fire pump engine 2. John Deere fire pump engine

Please note the conditions which must be observed in order to retain this permit.

If you have any questions concerning the above, please contact Hal Brock at 334-271-7944.

Sincerely,

  
Ronald W. Gore, Chief  
Air Division

RWG/hhb

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

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



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

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



U.S. Department  
of Transportation

Pipeline and Hazardous  
Materials Safety  
Administration

1200 New Jersey Avenue, SE  
Washington, DC 20590

## SPECIAL PERMIT AUTHORIZATION

DOT-SP 15726

**EXPIRATION DATE: 2025-11-30**

**GRANTEE:** Giant Resource Recovery-Attalla, Inc.  
Attalla, AL

In response to your November 22, 2021, application for renewal of party status to DOT-SP 15726 as a shipper, the grantee status to DOT-SP15726 for Giant Resource Recovery-Attalla, Inc. is hereby renewed in accordance with 49 CFR 107.113.

Copies of this special permit may be obtained by accessing the Office of Hazardous Materials Safety Homepage at <https://www.phmsa.dot.gov/approvals-and-permits/hazmat/special-permits-search>. The most recent revision of the special permit supersedes all previous revisions of the special permit. Photo reproductions and legible reductions of this special permit are permitted. Any alteration of this special permit is prohibited.

If you have questions regarding this action please call the Office of Hazardous Materials Safety, General Approvals and Permits Branch at (202) 366-4535.

Issued in Washington D.C. on **December 23, 2021.**

for William Schoonover  
Associate Administrator for Hazardous Materials Safety

Tracking Number: 2021115237

DUNS Number on file: 079361970



# CERTIFICATE OF LIABILITY INSURANCE

DATE (MM/DD/YYYY)

04/02/2025

**THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AFFIRMATIVELY OR NEGATIVELY AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW. THIS CERTIFICATE OF INSURANCE DOES NOT CONSTITUTE A CONTRACT BETWEEN THE ISSUING INSURER(S), AUTHORIZED REPRESENTATIVE OR PRODUCER, AND THE CERTIFICATE HOLDER.**

**IMPORTANT: If the certificate holder is an ADDITIONAL INSURED, the policy(ies) must have ADDITIONAL INSURED provisions or be endorsed. If SUBROGATION IS WAIVED, subject to the terms and conditions of the policy, certain policies may require an endorsement. A statement on this certificate does not confer rights to the certificate holder in lieu of such endorsement(s).**

<b>PRODUCER</b> MARSH USA, LLC. 4400 Comerica Bank Tower 1717 Main Street Dallas, TX 75201-7357  CN102608882-GRR-GAW-8-25-26	<b>CONTACT</b> NAME: Dallas Certificate Center PHONE (A/C, No. Ext): E-MAIL ADDRESS: HM.Request@marsh.com FAX (A/C, No):  <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <th style="text-align: center;">INSURER(S) AFFORDING COVERAGE</th> <th style="text-align: center;">NAIC #</th> </tr> <tr> <td>INSURER A: Liberty Mutual Fire Insurance Company</td> <td>23035</td> </tr> <tr> <td>INSURER B: Liberty Insurance Corporation</td> <td>42404</td> </tr> <tr> <td>INSURER C:</td> <td></td> </tr> <tr> <td>INSURER D:</td> <td></td> </tr> <tr> <td>INSURER E:</td> <td></td> </tr> <tr> <td>INSURER F:</td> <td></td> </tr> </table>	INSURER(S) AFFORDING COVERAGE	NAIC #	INSURER A: Liberty Mutual Fire Insurance Company	23035	INSURER B: Liberty Insurance Corporation	42404	INSURER C:		INSURER D:		INSURER E:		INSURER F:	
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INSURER E:															
INSURER F:															
<b>INSURED</b> Giant Resource Recovery 1229 Valley Drive Attalla, AL 35954															

**COVERAGES****CERTIFICATE NUMBER:**

HOU-004181167-02

**REVISION NUMBER:** 0

THIS IS TO CERTIFY THAT THE POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD INDICATED. NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS CERTIFICATE MAY BE ISSUED OR MAY PERTAIN, THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS AND CONDITIONS OF SUCH POLICIES. LIMITS SHOWN MAY HAVE BEEN REDUCED BY PAID CLAIMS.

INSR LTR	TYPE OF INSURANCE	ADDL INSD	SUBR WVD	POLICY NUMBER	POLICY EFF (MM/DD/YYYY)	POLICY EXP (MM/DD/YYYY)	LIMITS
A	<input checked="" type="checkbox"/> <b>COMMERCIAL GENERAL LIABILITY</b> <input type="checkbox"/> CLAIMS-MADE <input checked="" type="checkbox"/> OCCUR  GEN'L AGGREGATE LIMIT APPLIES PER: <input checked="" type="checkbox"/> POLICY <input type="checkbox"/> PRO-JECT <input type="checkbox"/> LOC <input type="checkbox"/> OTHER:			TB2-631-510811-075  Policy is effective 04/01/2025 for Giant Resource Recovery.	01/01/2025	01/01/2026	EACH OCCURRENCE \$ 10,000,000 DAMAGE TO RENTED PREMISES (Ea occurrence) \$ 10,000,000 MED EXP (Any one person) \$ 10,000 PERSONAL & ADV INJURY \$ 10,000,000 GENERAL AGGREGATE \$ 10,000,000 PRODUCTS - COMP/OP AGG \$ 10,000,000 Design Services E&O \$ 1,000,000
A	<b>AUTOMOBILE LIABILITY</b> <input checked="" type="checkbox"/> ANY AUTO <input type="checkbox"/> OWNED AUTOS ONLY <input type="checkbox"/> SCHEDULED AUTOS <input checked="" type="checkbox"/> HIRED AUTOS ONLY <input checked="" type="checkbox"/> NON-OWNED AUTOS ONLY			AS2-631-509529-025  Policy is effective 04/01/2025 for Giant Resource Recovery.	01/01/2025	01/01/2026	COMBINED SINGLE LIMIT (Ea accident) \$ 10,000,000 BODILY INJURY (Per person) \$ BODILY INJURY (Per accident) \$ PROPERTY DAMAGE (Per accident) \$ \$
	<b>UMBRELLA LIAB</b> <input type="checkbox"/> OCCUR <b>EXCESS LIAB</b> <input type="checkbox"/> CLAIMS-MADE DED <input type="checkbox"/> RETENTION \$						EACH OCCURRENCE \$ AGGREGATE \$ \$
B	<b>WORKERS COMPENSATION AND EMPLOYERS' LIABILITY</b> ANY PROPRIETOR/PARTNER/EXECUTIVE OFFICER/MEMBER EXCLUDED? <input checked="" type="checkbox"/> Y <input checked="" type="checkbox"/> N (Mandatory in NH) If yes, describe under DESCRIPTION OF OPERATIONS below		N/A	WA7-63D-509529-015 (AOS) WC7-631-509529-055 (MN, WI) WA7-63D-509529-855 (TX) Policies effective 04/01/25 for GRR	01/01/2025	01/01/2026	<input checked="" type="checkbox"/> PER STATUTE <input type="checkbox"/> OTH-ER E.L. EACH ACCIDENT \$ 10,000,000 E.L. DISEASE - EA EMPLOYEE \$ 10,000,000 E.L. DISEASE - POLICY LIMIT \$ 10,000,000
A	Pollution (Sudden and Accidental)			TB2-631-510811-075 Policy effective 04/01/25 for GRR.	01/01/2025	01/01/2026	Per Occurrence 5,000,000 Aggregate 5,000,000

**DESCRIPTION OF OPERATIONS / LOCATIONS / VEHICLES (ACORD 101, Additional Remarks Schedule, may be attached if more space is required)**

Evidence of Insurance.

**CERTIFICATE HOLDER****CANCELLATION**

Giant Resource Recovery - Attalla, Inc. 1229 Valley Drive Attalla, AL 35954	<p><b>SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, NOTICE WILL BE DELIVERED IN ACCORDANCE WITH THE POLICY PROVISIONS.</b></p> <p><b>AUTHORIZED REPRESENTATIVE</b></p> <p style="text-align: right;"><i>Marsh USA LLC</i></p>
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Land Division

JUL 16 2024

Received



DATE OF AMENDMENT:  
12JUL2024

CREDIT NUMBER: SDCMTN585703  
ISSUED ON : 11JUL2024

BENEFICIARY:  
CHIEF, LAND DIVISION ALABAMA  
DEPARTMENT OF ENVIRONMENTAL  
MANAGEMENT  
(SEE FULL ADDRESS BELOW)

APPLICANT:  
GIANT CEMENT HOLDING, INC.  
1600 DUKE STREET, SUITE 400  
ALEXANDRIA, VIRGINIA 22314

ADVISING BANK:

DC AMOUNT: USD 3,299,753.00

THIS AMENDMENT (NO. 001 ) FORMS  
AN INTEGRAL PART OF THE ABOVE  
MENTIONED STANDBY DOC CREDIT AND  
MUST BE ATTACHED THERETO.

INCREASE DC AMOUNT BY USD 102,318.00  
TO A NEW AMOUNT OF USD 3,299,753.00  
USD THREE MILLION TWO HUNDRED AND  
NINETY NINE THOUSAND SEVEN HUNDRED  
FIFTY THREE.00 ONLY

AMEND UNDERTAKING TERMS AND CONDITIONS AS FOLLOWS

BENEFICIARY'S FULL NAME AND ADDRESS:

CHIEF, LAND DIVISION ALABAMA DEPARTMENT OF ENVIRONMENTAL  
MANAGEMENT  
1400 COLLISEUM BOULEVARD  
MONTGOMERY, ALABAMA 36110-2400

1. WE HEREBY NOTIFY YOU THAT OUR REFERENCE NUMBER HAS CHANGED  
FROM SDCMTN572540 TO THE NEW REFERENCE NUMBER SDCMTN585703

PLEASE QUOTE SDCMTN585703 IN ALL FUTURE CORRESPONDENCE,  
INCLUDING BUT NOT LIMITED TO CLAIMS, ON THIS STANDBY LETTER OF  
CREDIT.

2. WE HEREBY INCREASE THE AMOUNT OF THIS STANDBY LETTER OF  
CREDIT BY USD 102,318.00 FROM USD 3,197,435.00 TO A NEW TOTAL  
AMOUNT OF USD 3,299,753.00

..... TO BE CONTINUED ON PAGE 2 .....

V001.02-1

*Jane Wu*  
HSBC Bank USA, N.A. Global Trade Solutions  
JANE WU (23151)  
ANALYST, Global Trade Solutions

*Tanvir Siddique*  
HSBC Bank USA, N.A. Global Trade Solutions  
TANVIR SIDDIQUE (23158)  
ASSISTANT VICE PRESIDENT, Global Trade Solutions

HSBC Bank USA, N.A.

Global Trade Solutions, Hudson Yards, The Spiral, 66 Hudson Blvd. East, New York, NY 10001 U.S.A



HSBC BANK USA, N.A.,

ATTACHED TO AND FORMING PART OF DC NO. SDCMTN585703

PAGE 2

DATE OF ISSUE:  
11JUL2024

BENEFICIARY:  
CHIEF, LAND DIVISION ALABAMA  
DEPARTMENT OF ENVIRONMENTAL  
MANAGEMENT  
(SEE FULL ADDRESS BELOW)

ALL OTHER TERMS AND CONDITIONS REMAIN UNCHANGED.

PLEASE NOTE THAT OUR ADDRESS HAS CHANGED. PLEASE SEND ALL CLAIMS  
AND CORRESPONDENCE AS PER THE TERMS AND CONDITIONS OF THE LETTER  
OF CREDIT TO THE FOLLOWING ADDRESS:

HSBC BANK USA, N.A.,  
GLOBAL TRADE SOLUTIONS (GTS) - TRANSACTION SERVICES,  
HUDSON YARDS, THE SPIRAL,  
66 HUDSON BLVD. EAST,  
NEW YORK, NY 10001, U.S.A.

FOR ANY QUERIES, CONTACT OUR CLIENT SERVICES TEAM AT:  
GTRF.USCS@US.HSBC.COM OR TELEPHONE NO. 1 866 327 0763  
OR FAX NO. 1 718 488 4909

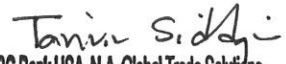
THIS AMENDMENT CONSISTS OF 2 PAGES

\*\*\*\*\*

AUTHORIZED SIGNER

V001.02-1

  
HSBC Bank USA, N.A. Global Trade Solutions  
JANE WU (23151)  
ANALYST, Global Trade Solutions

  
HSBC Bank USA, N.A. Global Trade Solutions  
TANVIR SIDDIQUE (22158)  
ASSISTANT VICE PRESIDENT, Global Trade Solutions

**HSBC Bank USA, N.A.**

Global Trade Solutions, Hudson Yards, The Spiral, 66 Hudson Blvd. East, New York, NY 10001 U.S.A



**Giant Resource Recovery - Attalla, Inc.**

**VIA ELECTRONIC MAIL AND CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

1229 Valley Drive  
Attalla, AL 35954  
(256) 538-3800  
Fax (256) 538-1836

February 1, 2024

Mr. Austin R. Pierce, Chief  
Engineering Services Section  
Industrial Hazardous Waste Branch, Land Division  
Alabama Department of Environmental Management  
1400 Coliseum Boulevard  
Montgomery, Alabama 36130-1463

**Re: Annual Adjustment of Closure Cost Estimate (2024)**  
**Giant Resource Recovery – Attalla, Inc.**  
**Attalla, Alabama**  
**EPA ID Number ALD 070 513 767**

Dear Mr. Pierce:

Pursuant to Alabama Department of Environmental Management (ADEM) Regulation 335-14-5-.08(3)(b), Giant Resource Recovery – Attalla, Inc. (GRR) submits its annual closure cost estimate update. The closure cost estimate was calculated using an inflation factor derived by a ratio of the 2023 3<sup>rd</sup> Quarter<sup>1</sup> and 2022 3<sup>rd</sup> Quarter<sup>2</sup> Implicit Price Deflators for Gross Domestic Product (122.668/118.872)<sup>3</sup> provided in Table 1.1.9 of the *Bureau of Economic Analysis Gross Domestic Product Report*. The updated closure cost estimate for fiscal year 2024 is \$3,299,753. This figure is based on updated closure costs of \$1,932,336 for the RCRA Storage Units and \$1,367,417 for Corrective Action.

Should you have any questions or require additional information, please contact Mr. Kyle C. Seagraves (256) 538-3800 ext. 8710, or me at (803) 809-4945.

Sincerely,

A handwritten signature in blue ink, appearing to read "J. Goins", is written over the typed name.

Jason D. Goins,  
Director of Environmental Affairs, GCHI

cc: US EPA Region IV  
Ricardo Yllescas Alvarez, GRR  
Rachel L. Odzer Craver, GRR  
Kyle C. Seagraves, GRR  
Cynthia Tidmore, GRR

<sup>1</sup> The 3<sup>rd</sup> Quarter 2023 factor is the most recent available, last revised on January 25, 2024.

<sup>2</sup> The 3<sup>rd</sup> Quarter 2022 factor is the factor as published on January 25, 2024.

<sup>3</sup> Line 27 (Gross National Product) of Table 1.1.9.

1400 Coliseum Blvd. 36110-2400 • Post Office Box 301463  
Montgomery, Alabama 36130-1463  
(334) 271-7700 • FAX (334) 271-7950

March 8, 2024

**TRANSMITTED ELECTRONICALLY**

Mr. Jason D. Goins  
Director of Environmental Affairs, GCHI  
Giant Resource Recovery - Attalla, Inc.  
1229 Valley Drive  
Attalla, Alabama 35954


Re: Annual Adjustment of Closure and Corrective Action Cost Estimates (2024)  
Giant Resource Recovery (GRR) - Attalla, Inc.  
1229 Valley Drive  
Attalla, Alabama 35954  
USEPA I.D. Number ALD 070 513 767

Dear Mr. Goins:

The Department has reviewed the Annual Adjustment of Closure and Corrective Action Cost Estimates (2024), dated February 1, 2024, and has determined it appears to be adequate and in compliance with the facility's Permit and ADEM Admin. Code Rules. 335-14-5-.08(3)(b) and 335-14-5-.08(10)(b) for the annual cost estimate inflation adjustment. The facility should submit an updated financial assurance instrument to meet the increased requirement within 60 days of the receipt of this letter.

If questions and comments should arise concerning this matter, please contact Tamaria L. McAlpin of the Engineering Services Branch, at (334) 274-4188.

Sincerely,



Austin R. Pierce, Chief  
Engineering Services Section  
Industrial Hazardous Waste Branch  
Land Division

ARP/TM

cc/via email: ADEM: Wade Reeves, Brent Watson, Ricky Minor  
GRR: Kyle C. Seagraves



**LANCE R. LEFLEUR**  
DIRECTOR



**KAY IVEY**  
GOVERNOR

**Alabama Department of Environmental Management**  
**adem.alabama.gov**

1400 Coliseum Blvd. 36110-2400 ■ Post Office Box 301463  
Montgomery, Alabama 36130-1463  
(334) 271-7700 ■ FAX (334) 271-7950

RECEIVED SEP 09 2024

*[Signature]*  
CC: R. Crover  
A. Lee  
C. Tidmore  
Facility File

September 9, 2024

**TRANSMITTED ELECTRONICALLY**

Mr. Kyle C. Seagraves  
Environmental, Health, and Safety Manager  
Giant Resource Recovery - Attalla, Inc.  
1229 Valley Drive  
Attalla, Alabama 35954

Re: Letter of Credit (2024)  
Giant Resource Recovery (GRR) - Attalla, Inc.  
1229 Valley Drive  
Attalla, Alabama 35954  
USEPA I.D. Number ALD 070 513 767

Dear Mr. Seagraves:

The Department has reviewed the Letter of Credit, dated June 12, 2024, and has determined it appears to be adequate and in compliance with the facility's Permit and ADEM Admin. Code Rule 335-14-5-.08.

If questions and comments should arise concerning this matter, please contact Tamaria L. McAlpin of the Engineering Services Branch, at (334) 274-4188.

Sincerely,

*Austin R. Pierce*  
Austin R. Pierce, Chief  
Engineering Services Section  
Industrial Hazardous Waste Branch  
Land Division

ARP/TM

cc/via email: ADEM: Wade Reeves, Jennifer McCord, Ricky Minor



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

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

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

