



01/23/2025

To: Nick Anderson (Group 14 BAM-2 Inc)
From: Chris Campbell (City of Moses Lake Wastewater Manager)
RE: Facility Name Up-Date / Reporting Parameter Change

Nick,

As per request the following changes to the City of Moses Lake Industrial Waste Discharge Permit NO. 26 are as follows:

1. The name of the facility shall be changed to **Group 14 BAM-2 Inc.** from Group14 Technologies Inc. Battery Active Materials Factory 2.
2. The analytical parameter of **Fats, Oils and Grease** shall be changed to **Method1664B** from Method 166A.

Please attach this letter to your current permit for validation.

A handwritten signature in blue ink, appearing to read 'CCGM', is positioned above the typed name and title.

Chris Campbell

Wastewater Manager

From: [Nick Anderson](#)
To: [Hallinan, Patrick J. \(ECY\)](#)
Cc: [Joy, Shara-Li \(ECY\)](#)
Subject: Re: Group14 Technologies Notice of No Discharge
Date: Monday, February 3, 2025 10:42:29 AM
Attachments: [Group 14 Cover Letter.pdf](#)

External Email

Pat,

Here is the cover letter from the city specifying our method change, will this be sufficient for Ecology?

Thanks,
Nick

On Wed, Jan 29, 2025 at 10:28 AM Nick Anderson <nianderson@group14.technology> wrote:

Pat,

Apologies for my delayed response. I reached out to our lab and it looks like Method 1664A is currently on the chopping block from the EPA to be removed from use and formally replaced with method 1664B. All of their labs except one have discontinued its use, and the last one is about to end its use as well. I reached out to Chris Campbell to see if the city will accept Method 1664B, which he said was fine. We are currently waiting on a cover letter containing that statement from the city. Once we receive that letter, if I forward that over to you, will that be acceptable to Ecology for us to use Method 1664B?

Absolutely, we will add sample results to our DMR submittals going forward, once we start discharging.

Here is a link to the Federal Register: <https://www.federalregister.gov/d/2024-29239/p-55>

Thanks,
Nick

On Tue, Jan 21, 2025 at 3:11 PM Hallinan, Patrick J. (ECY) <PHAL461@ecy.wa.gov> wrote:

Hi Nick,

Method 300.0 is an EPA-approved test method under 40 CFR Part 136 for chloride, nitrates, and sulfates. You're okay to use method 300.0 as long as it produces measurable results in the samples.

For Fats, Oils, and Greases (FOG), the City of Moses Lake has previously recommended to Ecology the use of EPA method 1664A – Hexane Extractable Material (HEM), in consideration of their local limits. So, you should switch to EPA Method 1664A.

If you could also attach (upload) the lab results from the monitoring to your DMRs, that would be great.

If you have any questions, please let us know.

Pat

Pat Hallinan

Washington State Department of Ecology

Water Quality Section

4601 N Monroe

Spokane, WA 99205

(509) 329-3500 office

(509) 655-9239 cell

From: Nick Anderson <nianderson@group14.technology>

Sent: Monday, January 20, 2025 9:13 AM

To: Hallinan, Patrick J. (ECY) <PHAL461@ECY.WA.GOV>

Cc: Joy, Shara-Li (ECY) <STRA461@ECY.WA.GOV>

Subject: Re: Group14 Technologies Notice of No Discharge

External Email

Pat,

We have received the order to monitor. I looked over the methods listed for the associated monitoring parameters and compared them to the lab we have contracted with to test our samples as outlined in our O&M manual.

For Fats, Oils, and Greases, the order lists EPA 1664A while our lab utilizes 1664B.

For Chlorine, the order lists Sm4500-Cl and SM4110-B, while our lab utilizes method 300.0.

For Nitrates and Sulfates, the order lists SM4110-B, while our lab uses method 300.0.

Will these method substitutions be satisfactory substitutions in accordance with the amendment section of the order to monitor, or should we find another lab to test these samples at?

Thanks,

Nick

On Tue, Jan 7, 2025 at 7:33 AM Hallinan, Patrick J. (ECY) <PHAL461@ecy.wa.gov> wrote:

Nick,

Thanks for the update.

Pat

Pat Hallinan

Washington State Department of Ecology

Water Quality Section

4601 N Monroe

Spokane, WA 99205

(509) 329-3500 office

(509) 655-9239 cell

From: Nick Anderson <nianderson@group14.technology>

Sent: Monday, January 6, 2025 12:36 PM

To: Hallinan, Patrick J. (ECY) <PHAL461@ECY.WA.GOV>; Chris Campbell <ccampbell@cityofml.com>; Public Works Admin <Publicworksadmin@cityofml.com>

Cc: Paul Stenhouse <pstenhouse@group14.technology>; Joy, Shara-Li (ECY) <STRA461@ECY.WA.GOV>

Subject: Re: Group14 Technologies Notice of No Discharge

External Email

Pat,

I hope your holidays were good. I was just informed this morning that due to a construction delay, we will be pushing our planned discharge date to March 1st instead of January 13th. If this date changes again, I will let you know.

Thanks,

Nick

On Thu, Jan 2, 2025 at 8:18 AM Nick Anderson <nianderson@group14.technology> wrote:

Pat,

As per our phone conversation on July 17th, here is notification of No Discharge for the month of December 2024 from Group14 Technologies' BAM-2 Facility located at 13431 Wheeler Road NE. Moses Lake Washington, and as requested, Chris Cambell with the city of Moses Lake is CC on this email.

Attached is the updated Ecology spreadsheet checked for no discharge and, as per Group14's discussion with Shari-Li, a signed cover letter containing the required signature text block.

Thanks,

Nick

On Fri, Dec 20, 2024 at 9:47 AM Nick Anderson <nianderson@group14.technology> wrote:

Pat,

The most recent update I have from our construction team places us beginning to discharge around the 13th of January. If this date changes I will let you know.

Thanks,

Nick

On Mon, Dec 2, 2024 at 8:01 AM Nick Anderson <nianderson@group14.technology> wrote:

Pat,

As per our phone conversation on July 17th, here is notification of No Discharge for the month of November from Group14 Technologies' BAM-2 Facility located at 13431 Wheeler Road NE. Moses Lake Washington, and as requested, Chris Cambell with the city of Moses Lake is CC on this email.

We are currently pushing back our estimated date to begin discharging to potentially mid/late December. I will update Ecology and the City once that date is finalized. Attached is the updated Ecology spreadsheet checked for no discharge and, as per Group14's discussion with Shari-Li, a signed cover letter containing the required signature text block.

Thanks,

Nick

On Wed, Nov 6, 2024 at 3:28 PM Nick Anderson
<nianderson@group14.technology> wrote:

Pat,

As per our phone conversation on July 17th, here is notification of No Discharge for the month of October from Group14 Technologies' BAM-2 Facility located at 13431 Wheeler Road NE. Moses Lake Washington, and as requested, Chris Cambell with the city of Moses Lake is CC on this email.

We are currently pushing back our estimated date to begin discharging to potentially late November/early December. I will update Ecology and the City once that date is finalized. Attached is the updated Ecology spreadsheet checked for no discharge and, as per Group14's discussion with Shari-Li, a signed cover letter containing the required signature text block.

Thanks,

Nick

On Tue, Oct 1, 2024 at 12:24 PM Nick Anderson
<nianderson@group14.technology> wrote:

Pat,

As per our phone conversation on July 17th, here is notification of No Discharge for the month of September from Group14 Technologies' BAM-2 Facility located at 13431 Wheeler Road NE. Moses Lake Washington, and as requested, Chris Cambell with the city of Moses Lake is CC on this email.

We are currently looking at potentially beginning discharge mid to late October. I will update Ecology and the City once that date is finalized. I have also filled out the September Month on the DMR spreadsheet with all C's for no discharge and attached.

Thanks,

Nick

On Thu, Sep 5, 2024 at 11:15 AM Nick Anderson
<nianderson@group14.technology> wrote:

Pat,

Thank you for sending this over, I will take a look and let you know if I notice any issues. We will begin using this spreadsheet going forward on our discharge reporting to Ecology and will continue to include the City of Moses Lake on our submissions.

Thanks,

Nick

On Thu, Sep 5, 2024 at 9:44 AM Hallinan, Patrick J. (ECY)
<PHAL461@ecy.wa.gov> wrote:

Nick,

I've attached the spreadsheet. Please review, and if you see anything that needs revision, please let us know.

Pat

Pat Hallinan

Washington State Department of Ecology

Water Quality Section

4601 N Monroe

Spokane, WA 99205

(509) 329-3500 office

(509) 655-9239 cell

From: Nick Anderson <nianderson@group14.technology>

Sent: Tuesday, September 3, 2024 8:23 AM

To: Hallinan, Patrick J. (ECY) <PHAL461@ECY.WA.GOV>

Cc: Chris Campbell <ccampbell@cityofml.com>; Paul Stenhouse <pstenhouse@group14.technology>; Publicworksadmin@cityofml.com

Subject: Re: Group14 Technologies Notice of No Discharge

External Email

Pat,

As per our phone conversation on July 17th, here is notification of No Discharge for the month of August from Group14 Technologies' BAM-2 Facility located at 13431 Wheeler Road NE. Moses Lake

Washington, and as requested, Chris Cambell with the city of Moses Lake is CC on this email.

Additionally, here is a reminder that we are waiting on our spreadsheet to provide Ecology with discharge information in the interim of finalizing the formal permit. As per our phone conversation August 26th, we are expecting this to begin around the end of September.

Thanks,

Nick

On Thu, Aug 1, 2024 at 9:01 AM Nick Anderson
<nianderson@group14.technology> wrote:

Pat,

As per our phone conversation on July 17th, here is notification of No Discharge from Group14 Technologies' BAM-2 Facility located at 13431 Wheeler Road NE. Moses Lake Washington, and as requested, Chris Cambell with the city of Moses Lake is CC on this email.

Additionally, here is a reminder that we are waiting on our spreadsheet to provide Ecology with discharge information in the interim of finalizing the formal permit.

Thanks,

Nick

On Wed, Jul 17, 2024 at 3:13 PM Nick Anderson
<nianderson@group14.technology> wrote:

Pat,

As per our phone conversation, here is notification of No Discharge from Group14 Technologies' BAM-2 Facility located at 13431 Wheeler Road NE. Moses Lake Washington, and as requested, Chris Cambell with the city of Moses Lake is CC on this email.

Additionally, as discussed, here is a reminder that we are waiting on our spreadsheet to provide Ecology with discharge information in the interim of finalizing the formal permit.

Our current construction estimates put our first discharge of wastewater from the facility at the end of September. All line testing water will be retained on site and not discharged from the facility, as per Chris Cambell's request that we do not discharge large quantities of clean, potable water to the city sewer line.

Thanks,

Nick

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Nicholas Anderson

Environmental Specialist - Water

(509) 301-6942

Group14 ∴ an elemental approach to better batteries

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