

STATE OF NEVADA
Department of Conservation and Natural Resources
Division of Environmental Protection
Bureau of Mining Regulation and Reclamation

Water Pollution Control Permit

Permittee: **Albemarle U.S., Inc.**
 Silver Peak Lithium Project
 P.O. Box 98
 Silver Peak, NV 89047

Permit Number: **NEV0070005**
Review Type/Year/Revision: **Renewal 2023, Revision 00**

Pursuant to Nevada Revised Statutes (NRS) 445A.300 through 445A.730, inclusive, and regulations promulgated thereunder by the State Environmental Commission and implemented by the Division of Environmental Protection (the Division), this Permit authorizes the Permittee to construct, operate, and close the Silver Peak Lithium Project, in accordance with the limitations, requirements, and other conditions set forth in this Permit. The Permittee is authorized to process up to **7,500 tons** of ore per year using chemicals.

The facility is located in Esmeralda County within portions of Sections 26 through 28, Township 1 South (T1S), Range 40 East (R40E); Sections 1, 12, 13, and 21 through 25, T2S, R39E; and Sections 1 through 11, 15 through 20, and 29 through 32, T2S, R40E, Mount Diablo Baseline and Meridian, approximately 40 miles southwest of Tonopah, near the town of Silver Peak.

The Permittee must comply with all terms and conditions of this Permit and all applicable statutes and regulations.

This Permit is based on the assumption that the information submitted in the application of 20 January 1990, as modified by subsequent approved amendments, is accurate and that the facility has been constructed and is being operated as specified in the application. The Permittee must inform the Division of any deviation from, or changes in, the information in the application, which may affect the ability of the Permittee to comply with applicable regulations or Permit conditions.

This Permit is effective as of **XX Month 2023**, and shall remain in effect until **23 March 2027**, unless modified, suspended, or revoked.

Signed this ____ day of **Month 2023**.

Robert Kuczynski, P.E.
Chief, Bureau of Mining Regulation and Reclamation

I. Specific Facility Conditions and Limitations

A. In accordance with operating plans and facility design plans reviewed and approved by the Division the Permittee shall:

1. Construct, operate, and close the facility in accordance with those plans;
2. Contain within the fluid management system all process fluids including all meteoric waters which enter the system as a result of the 25-year, 24-hour storm event; and
3. Not release or discharge any process or non-process contaminants from the fluid management system.

B. Schedule of Compliance:

1. Within 60 (sixty) days after the effective date of this Permit, the Permittee shall submit to the Division detailed documentation and data to demonstrate whether the concentration of any constituent in any discharge authorized by the Permit exceeds the greater of:

- a. A state or federal regulation prescribing standards for drinking water; or
- b. The natural background concentration of the regulated drinking water constituent.

And, if so, whether the resultant concentration of that constituent or those constituents renders the receiving groundwater unsuitable for the existing or potential municipal, industrial, domestic, or agricultural use.

2. If the Permittee's demonstration shows degradation, as defined in NAC 445A.424(1)(b) or (c), within 30 days of the Division's written response to the Permittee's demonstration, the Permittee shall:

- a. Apply for an aquifer exemption consistent with the requirements of NAC 445A.424(2); or
- b. Submit to the Division a plan and application for Permit modification to eliminate the discharge exceedance(s).

C. The fluid management system covered by this Permit consists of the following process components:

1. Process plants including, but not limited to, all tanks (e.g. tank farm and acid tanks), basins, sumps, pumps, and piping necessary to connect components of the process facility;
2. Evaporation ponds, liming facility, and the R-2 pond; and
3. Transfer pipes, ditches, valves, and pumps used in conveyance, control or detection of process fluids between process components.

D. Monitoring Requirements:

<u>Identification</u>	<u>Parameter</u>	<u>Frequency</u>
1. <u>Water Supply</u> Fresh Water Well (WS)	Profile I ⁽¹⁾ , Uranium ⁽⁹⁾ , and static water elevation, feet amsl	Quarterly
2. <u>Monitoring Well</u> Adjacent to the R-2 Pond (R-2W)	Profile I ⁽¹⁾ , Uranium ⁽⁹⁾ , and static water elevation level, feet amsl	Quarterly
3. <u>Ponds</u> R-2 Pond (R-2)	Minimum freeboard, feet	Quarterly
4. <u>Process Solution</u> Plant Influent (PI) Lithium Hydroxide Plant Waste Stream (HPWS) Lithium Carbonate Plant Waste Stream (CPWS)	Profile I ⁽¹⁾ and Uranium ⁽⁹⁾	Annually
5. <u>Brine Well⁽²⁾ (BW)</u>	Profile I ⁽¹⁾ , Uranium ⁽⁹⁾ , and Static water elevation, feet amsl	Annually
6. <u>Petroleum Contaminated Soil (PCS) Screening Analyses:</u> Each temporary holding pad cell, by PCS source type	VOCs ⁽³⁾ , SVOCs ⁽⁴⁾ , TPH ⁽⁵⁾	Prior to removal ⁽⁶⁾

<u>Identification</u>	<u>Parameter</u>	<u>Frequency</u>
7. <u>PCS Hazardous Waste Determinations:</u> Each PCS source	Hazardous waste determination ⁽⁷⁾	When required ⁽⁷⁾
8. <u>PCS Management:</u> Each temporary holding pad, treatment cell, and disposal location, by PCS source type	PCS volume added, volume removed and destination, total volume present (cubic yards)	Quarterly

The Permittee may request a reduction in the monitoring frequency after four quarters of complete monitoring based on justification other than cost. Such reductions may be considered formal modifications to the Permit and require payment of modification fees.

Abbreviations and Definitions:

amsl = above mean sea level; pH = the negative of the base 10 logarithm of the activity of the hydrogen ion; S.U. = standard units for pH measurements; VOCs = volatile organic compounds; SVOCs = semi-volatile organic compounds; TPH = total petroleum hydrocarbons; pCi/L = picocuries per liter; PCS = Petroleum Contaminated Soil; EPA = U.S. Environmental Protection Agency; NDEP = Nevada Division of Environmental Protection;

Footnotes:

(1) Profile I:

General Chemistry Parameters		
Alkalinity (as CaCO ₃)	Chloride	pH (± 0.1 S.U.) ⁽⁸⁾
Bicarbonate ⁽⁹⁾	Fluoride	Sulfate
Total ⁽⁹⁾	Nitrate + Nitrite (as N)	Total Dissolved Solids
	Nitrogen Total (as N)	--
Metals Dissolved		
Aluminum	Chromium	Potassium
Antimony	Copper	Selenium
Arsenic	Iron	Silver
Barium	Lead	Sodium

Beryllium	Magnesium	Thallium
Cadmium	Manganese	Zinc
Calcium	Mercury	--

- (2) A different production (brine) well shall be sampled each year.
- (3) Volatile Organic Compounds (VOCs) analyzed by a Nevada-certified laboratory using EPA Method 8260B.
- (4) Semi-Volatile Organic Compounds (SVOCs) analyzed by a Nevada-certified laboratory using EPA Method 8270D.
- (5) Total Petroleum Hydrocarbons (TPH) analyzed by a Nevada-certified laboratory using EPA Method 8015 Modified. If any gasoline-range petroleum is suspected, or if the source-type is unknown, both TPH-P (purgeable) and TPH-E (extractable) are required. Otherwise, only TPH-E is required.
- (6) Each segregated source type of PCS must be sampled separately pursuant to the approved sample collection protocol. For temporary holding pads and treatment cells, analyses are required only in quarters when PCS removal from the pad is anticipated. Removal to an on-site disposal location is authorized if PCS meets screening levels. For approved on-site disposal locations, analyses are required only in quarters when PCS has been provisionally placed subject to screening results.
- (7) A hazardous waste determination is required: a) Initially, for each PCS source prior to management under the PCS Management Plan; b) When a PCS waste stream is suspected to have changed character since the last determination; and c) When a hazardous constituent is detected during screening analyses at a concentration suggestive of hazardous waste. Determinations must be performed pursuant to 40 Code of Federal Regulations (CFR) 262.11 using operator knowledge and/or applicable analytical testing methods described in EPA publication SW-846. Operator knowledge must be adequately described and sufficient to justify the determination.
- (8) All sample analyses resulting in a pH value less than or equal to 5.0 SU shall also be analyzed for acidity (mg/L, as CaCO₃ equivalent).
- (9) All sample analyses resulting in a pH value greater than or equal to 4.5 SU shall be analyzed for Alkalinity (Bicarbonate and Total).
- (10) Uranium (total) shall be reported in mg/L and have the reference value of 0.03 mg/L. If uranium (total) concentration is ≥ 0.030 mg/L, analysis for the Profile I⁽¹⁾, Uranium, and Profile R⁽¹⁰⁾ is required in the subsequent quarter.

(11) Profile R:

Parameter	Reference Value/Unit
Gross Alpha ⁽¹²⁾	pCi/L
Adjusted Gross Alpha*	15 pCi/L
226Radium	pCi/L
228Radium	pCi/L
226Radium + 228Radium	5 pCi/L

*Adjusted gross alpha is gross alpha minus uranium activity in pCi/L.

(12) If the sample location is known to have a TDS greater than 1,000 mg/L, gross alpha must be analyzed using an appropriate method, e.g., EPA 00-02, EPA 900.0. Additionally, if the reported gross alpha activity is less than or equal to 15 pCi/L and the uncertainty of the adjusted gross alpha analysis is greater than or equal to 15 pCi/L is acceptable (e.g. 36 ± 21 pCi/L would be acceptable since the low range is at 15 pCi/L). Please utilize the appropriate method to minimize the uncertainty. See Profile R analyte list on the Division’s website for additional information.

E. Quarterly and annual monitoring reports shall be in accordance with Part II.B.

F. All sampling and analytical accuracy shall be in accordance with Part II.E.

G. Permit Limitations

1. A minimum of 2 feet of freeboard shall be maintained in the R-2 Pond at all times. All other ponds must maintain a freeboard of 1 foot.
2. PCS that exceeds screening levels shall not be placed at an on-site disposal location.
3. Failure to meet a Schedule of Compliance date or requirement.

Exceedances of these limitations may be Permit violations and shall be reported as specified in Part II.B.4.

H. The facility shall maintain an automated or manual calibrated rain gauge, which shall be monitored at least daily, to record daily precipitation (inches of water, including snow water equivalent). A written and/or electronic record of daily accumulations of precipitation shall be maintained on site and shall be submitted to the Division upon request, with each Permit renewal application, and pursuant to Parts II.B.1 and II.B.2, as applicable, in a Division-approved electronic format.

I. The Permittee shall inspect all control devices, systems, and facilities weekly, and during (when possible) and after major storm events. These inspections are performed to detect evidence of:

1. Deterioration, malfunction, or improper operation of control or monitoring systems;
2. Sudden changes in the data from any monitoring device; and

3. Severe erosion or other signs of deterioration in dikes, diversions, closure covers, or other containment devices.
- J. Prior to initiating permanent closure activities at the facility, or at any process component or other source within the facility, the Permittee must have an approved final plan for permanent closure.
 - K. The Permittee shall remit an annual review and services fee in accordance with NAC 445A.232 starting July 1 after the effective date of this Permit and every year thereafter until the Permit is terminated or the facility has received final closure certification from the Division.
 - L. The Permittee shall not dispose of or treat PCS on the mine site except as authorized by the approved PCS Management Plan. The approved PCS Management Plan, and the Division's Guidance for Mine-Site PCS Management Plans are hereby incorporated into this Permit by reference.
 - M. When performing dust suppression activities, the Permittee shall use best management practices and appropriate selection of water source and additives to prevent degradation of waters of the State. If a dust suppressant exceeds a water quality standard and the corresponding natural background water concentration in the area where dust suppression will occur, the Permittee shall demonstrate no potential to degrade waters of the State.
 - N. Continuing Investigations: None Required
- II. General Facility Conditions and Limitations
- A. General Requirements
1. The Permittee shall achieve compliance with the conditions, limitations, and requirements of the Permit upon commencement of each relevant activity. The Administrator may, upon the request of the Permittee and after public notice (if required), revise or modify a Schedule of Compliance in an issued Permit if he or she determines good and valid cause (such as an act of God, a labor strike, materials shortage or other event over which Permittee has little or no control) exists for such revision.
 2. The Permittee shall at all times maintain in good working order and operate as efficiently as possible, all devices, facilities, and systems installed or used by the Permittee to achieve compliance with the terms and conditions of this Permit.
 3. Whenever the Permittee becomes aware that he or she failed to submit any relevant facts in the Permit application, or submitted incorrect information in a Permit application or in any report to the Administrator, the Permittee shall promptly submit such facts or correct information. Any inaccuracies found in this information may be grounds for revocation or modification of this Permit and appropriate enforcement action.

B. Reporting Requirements

1. The Permittee shall submit quarterly reports, in both hard copy and a Division-approved electronic format, which are due to the Division on or before the 28th day of the month following the quarter and must contain the following:
 - a. Monitoring results from those locations identified in Parts I.D.1, I.D.2, and I.D.3;
 - b. Analytical results of the solution collected from monitoring locations identified in Parts I.D.1 and I.D.2 reported on Nevada Division of Environmental Protection (NDEP) Form 0190 or equivalent;
 - c. A summary of all monitoring locations which had uranium greater than or equal to 0.03 mg/L with the planned next step of sampling per Part I.D, Footnote (10);
 - d. A record of releases, and the remedial actions taken in accordance with the approved Emergency Response Plan on NDEP Form 0490 or equivalent;
 - e. Analytical results, copies of hazardous waste determinations, and monitoring results, identified in Parts I.D.6, I.D.7, and I.D.8, pertaining to the approved PCS Management Plan; and
 - f. An updated list of all PCS sources managed under the approved PCS Management Plan, with any new or changed sources highlighted, reported on NDEP Form PCS-01 or equivalent; current screening levels for each on-site disposal location; and a detailed explanation of any revisions to screening levels.

Facilities which have not initiated mining or construction, must submit a quarterly report identifying the status of mining or construction. Subsequent to any noncompliance or any facility expansion which provides increased capacity, the Division may require an accelerated monitoring frequency.

2. The Permittee shall submit an annual report, in both hard copy and a Division-approved electronic format, by February 28th of each year, for the preceding calendar year, which contains the following:
 - a. Analytical results of the solution collected from monitoring locations identified in Parts I.D.4 and I.D.5;
 - b. Monitoring results from the location identified in Part I.D.5;
 - c. A synopsis of releases on NDEP Form 0390 or equivalent;
 - d. A brief summary of site operations, including the number of tons of ore processed during the year, construction and expansion activities and major problems with the fluid management system;
 - e. A table of total monthly precipitation amounts reported for the five-year history previous to the date of submittal;

- f. An updated version of the facility monitoring and sampling procedures and protocols;
 - g. An updated evaluation of the closure plan using specific characterization data for each process component with respect to achieving stabilization; and
 - h. Graphs of leak detection flow rates, pH, total dissolved solids (TDS), sulfate, chloride, nitrate + nitrite (as N), fluoride, zinc, and arsenic concentration (as applicable), versus time for all fluid sampling points. These graphs shall display a five-year history previous to the date of submittal. Additional constituents may be required by the Division if deemed necessary.
3. Release Reporting Requirements: The following applies to facilities with an approved Emergency Response Plan. If a site does not have an approved Emergency Response Plan, then all releases must be reported as per NAC 445A.347 or NAC 445A.3473, as appropriate.
- a. A release of any quantity of hazardous substance, as defined at NAC 445A.3454, to surface water, or that threatens a vulnerable resource, as defined at NAC 445A.3459, must be reported to the Division as soon as practicable after knowledge of the release, and after the Permittee notifies any emergency response agencies, if required, and initiates any action required to prevent or abate any imminent danger to the environment or the health or safety of persons. An oral report shall be made by telephone to (888)-331-6337 for in-State callers or (775) 687-9485 for out-of-State callers, and a written report shall be provided within 10 days in accordance with Part II.B.4.b.
 - b. A release of a hazardous substance in a quantity equal to or greater than that which is required to be reported to the National Response Center pursuant to 40 CFR Part 302 must be reported as required by NAC 445A.3473 and Part II.B.3.a.
 - c. A release of a non-petroleum hazardous substance not subject to Parts II.B.3.a. or II.B.3.b., released to soil or other surfaces of land, and the total quantity is equal to or exceeds 500 gallons or 4,000 pounds, or that is discovered in or on groundwater in any quantity, shall be reported to the Division no later than 5:00 P.M. of the first working day after knowledge of the release. The release shall be reported through the online reporting system available at <http://www.ndep.nv.gov> or an oral report shall be made by telephone to (888) 331-6337. A written report shall be provided within 10 days in accordance with Part II.B.4.b. Smaller releases, with total quantity greater than 25 gallons or 200 pounds and less than 500 gallons or 4,000 pounds, released to soil or other surfaces of land, or discovered in at least 3 cubic yards of soil, shall be reported quarterly on NDEP Form 0390 or equivalent.

- d. Petroleum Products and Coolants: If a release is subject to Parts II.B.3.a. or II.B.3.b., report as specified in Part II.B.3.a. Otherwise, if a release of any quantity is discovered on or in groundwater, or if the quantity is equal to or greater than 100 gallons released to soil or other surfaces of land, report as specified in Part II.B.3.c. Smaller releases, greater than 25 gallons but less than 100 gallons, released to soil or other surfaces of land, or if discovered in at least 3 cubic yards of soil, shall be reported quarterly on NDEP Form 0390 or equivalent.
4. The Permittee shall report to the Administrator any noncompliance with the Permit.
 - a. Each such event shall be reported orally by telephone to (775) 687-9400, not later than 5:00 P.M. of the next regular work day from the time the Permittee has knowledge of the circumstances. This report shall include the following:
 - i. Name, address, and telephone number of the owner or operator;
 - ii. Name, address, and telephone number of the facility;
 - iii. Date, time, and type of incident, condition, or circumstance;
 - iv. If reportable hazardous substances were released, identify material and report total gallons and quantity of contaminant;
 - v. Human and animal mortality or injury;
 - vi. An assessment of actual or potential hazard to human health and the environment outside the facility; and
 - vii. If applicable, the estimated quantity of material that will be disposed and the disposal location.
 - b. A written summary shall be provided within 10 days of the time the Permittee makes the oral report. The written summary shall contain:
 - i. A description of the incident and its cause;
 - ii. The periods of the incident (including exact dates and times);
 - iii. If reportable hazardous substances were released, the steps taken and planned to complete, as soon as reasonably practicable, an assessment of the extent and magnitude of the contamination pursuant to NAC 445A.2269;
 - iv. Whether the cause and its consequences have been corrected, and if not, the anticipated time each is expected to continue; and
 - v. The steps taken or planned to reduce, eliminate, and prevent recurrence of the event.
 - c. The Permittee shall take all available and reasonable actions, including more frequent and enhanced monitoring to:

- i. Determine the effect and extent of each incident;
 - ii. Minimize any potential impact to the waters of the State arising from each incident;
 - iii. Minimize the effect of each incident upon domestic animals and all wildlife; and
 - iv. Minimize the endangerment of the public health and safety which arises from each incident.
- d. If required by the Division, the Permittee shall submit, as soon as reasonably practicable, a final written report summarizing any related actions, assessments, or evaluations not included in the report required in Part II.B.4.b., and including any other information necessary to determine and minimize the potential for degradation of waters of the State and the impact to human health and the environment. Submittal of the final report does not relieve the Permittee from any additional actions, assessments, or evaluations that may be required by the Division.

C. Administrative Requirements

1. A valid Permit must be maintained until permanent closure is complete. Therefore, unless permanent closure has been completed and termination of the Permit has been approved in writing by the Division, the Permittee shall apply for Permit renewal not later than 120 days before the Permit expires.
2. Except as required by NAC 445A.419 for a Permit transfer, the Permittee shall submit current Permit contact information described in paragraphs (a) through (c) of subsection 2 of NAC 445A.394 within 30 days after any change in previously submitted information.
3. All reports and other information requested by the Administrator shall be signed and certified as required by NAC 445A.231.
4. All reports required by this Permit, including, but not limited to, monitoring reports, corrective action reports, and as-built reports, as applicable, and all applications for Permit modifications, shall be submitted in both hard copy and a Division-approved electronic format.
5. When ordered consistent with Nevada Statutes, the Permittee shall furnish any relevant information in order to determine whether cause exists for modifying, revoking and reissuing, or permanently revoking this Permit, or to determine compliance with this Permit.
6. The Permittee shall maintain a copy of, and all modifications to, the current Permit at the Permitted facilities at all times.
7. The Permittee is required to retain during operation, closure, and post-closure monitoring, all records of monitoring activities and analytical results, including all original strip chart recordings for continuous monitoring

instrumentation, and all calibration and maintenance records. This period of retention must be extended during the course of any unresolved litigation.

8. The provisions of this Permit are severable. If any provision of this Permit, or the application of any provision of this Permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this Permit, shall not thereby be affected.
9. The Permittee is authorized to manage fluids and solid wastes in accordance with the conditions of this Permit. Issuance of this Permit does not convey property rights of any sort or any exclusive privilege; nor does it authorize any injury to persons or property, any invasion of other private rights, or any infringement of Federal, State or local law or regulations. Compliance with the terms of this Permit does not constitute a defense to any order issued or any action brought under the Water Pollution Control Statutes for releases or discharges from facilities or units not regulated by this Permit. NRS 445A.675 provides that any person who violates a Permit condition is subject to administrative or judicial action provided in NRS 445A.690 through 445A.705.

D. Division Authority

The Permittee shall allow authorized representatives of the Division, at reasonable times, and upon the presentation of credentials to:

1. Enter the premises of the Permittee where a regulated activity is conducted or where records are kept per the conditions of this Permit;
2. Have access to and copy any record that must be kept per the conditions of this Permit;
3. Inspect and photograph any facilities, equipment (including monitoring and control equipment), practices, or operations regulated by this Permit; and
4. Sample or monitor for any substance or parameter at any location for the purposes of assuring Permit and regulatory compliance.

E. Sampling and Analysis Requirements

1. Samples and measurements taken for the purpose of monitoring shall be representative of the monitored activity.
2. For each measurement or sample taken pursuant to the conditions of this Permit, the Permittee shall record the following information:
 - a. The exact place, date, and time of the inspection, observation, measurement, or sampling; and
 - b. The person(s) who inspected, observed, measured, or sampled.
3. Samples must be taken, preserved, and labeled according to Division approved methods.

4. Standard environmental monitoring chain of custody procedures must be followed.
5. Samples shall be analyzed by a laboratory certified by the State of Nevada. The Permittee must identify the certified laboratory used to perform the analyses, laboratory reference number, sample date and laboratory test date in quarterly and annual reports.
6. The accuracy of analytical results, unless otherwise specified, shall be expressed in mg/L and reliable to at least two significant digits. The analytical methods used must have practical quantitation limit (PQL) equal to or less than one-half the reference value for Profile I constituents. Laboratories shall report the lowest reasonable PQL based on in-house method detection limit studies. Samples for Profile I parameters shall be filtered and analyzed for the dissolved fraction, unless otherwise required by the Division. Unless otherwise approved by the Division, analytical results that are less than the PQL shall be reported quantitatively by listing the PQL value preceded by the “<” symbol.

F. Permit Modification Requirements

1. Any material modification, as defined at NAC 445A.365, plan to construct a new process component, or proposed change to Permit requirements must be reported to the Division by submittal of an application for a Permit modification, or if such changes are in conformance with the existing Permit, by submittal of a written notice of the changes. The Permit modification application must comply with NAC 445A.391 through 445A.399, 445A.410, 445A.412, 445A.414, 445A.4155, 445A.416, 445A.417, 445A.440, and 445A.442, as applicable. The construction or modification shall not commence, nor shall a change to the Permit be effective, until written Division approval is obtained.
2. Prior to the commencement of mining activities at any site within the State which is owned or operated by the Permittee but not identified and characterized in a previously submitted application or report, the Permittee shall submit to the Division a report which identifies the locations of the proposed mine areas and waste disposal sites, and characterizes the potential of mined materials and areas to release pollutants. Prior to development of these areas the Division shall determine if any of these new sources will be classified as process components and require engineered containment as well as Permit modification.
3. The Permittee shall notify the Division in writing at least 30 days before the introduction of process solution into a new process component or into an existing process component that has been materially modified, or of the intent to commence active operation of that process component. Before introducing process solution or commencing active operation, the Permittee shall obtain written authorization from the Division.

4. The Permittee must obtain a written determination from the Administrator of any planned process component construction or material modification, or any proposed change to Permit requirements, as to whether it is considered a Permit modification, and if so, what type.
5. The Permittee must give advance notice to the Administrator of any planned changes or activities which are not material modifications in the Permitted facility that may result in noncompliance with Permit requirements.

Prepared by: Robert Kuczynski P.E., Chief, NDEP-BMRR
Date: XX May 2023
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