



State of Tennessee  
**Department of Environment and Conservation**  
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March 5, 2020

Mr. Jeffrey C. Weida  
Location Manager  
Arconic Tennessee, LLC  
2300 North Wright Rd.  
Alcoa, TN 37701

Subject: Compliance Evaluation Inspection  
NPDES Permit No. TN0067199 North Plant  
NPDES Permit No. TN0065081 South Plant  
Blount County

Dear Mr. Weida:

On February 11, 2020, Hassan Sanaat and I came to conduct a Compliance Evaluation Inspection (CEI) regarding the two above-referenced NPDES permits. On this day the facilities were handling excess water due to heavy rains immediately preceding this time. Please note the following:

### **North Plant**

#### **Permit**

The Central Office has just issued a minor modification transferring the permit from Arconic, Inc. to Arconic Tennessee, LLC, reflecting a change in ownership. NPDES permit TN0067199 covers the North Plant including industrial wastewater and groundwater from Outfall 001, industrial wastewater, landfill leachate and storm water runoff from Outfall 007, and industrial wastewater and storm water runoff from SW1, and storm water runoff from 01N, 01S, 01E, N01-N06 and N08-N12.

### Site Review

1. At the 001 basin the rope skimmer was functioning. The sodium bisulfite tank has been renovated or replaced. The company needs to replace the control building, which is deteriorating though still functional. The building contains an online turbidimeter for detection of spills or unusual discharges, and other continuous monitors. The outfall was submerged due to high flow conditions in the receiving stream. The ISCO sampler was in service to collect flow proportional samples and was noted as having a temperature of 3.5 °C inside the unit.
2. The 01S outfall was discharging heavily as designed for high flow periods with moderately turbid water. The online turbidimeter for advance detection of spills and irregular discharges appeared not to be working at that time as it was reading an unrealistic value of 1.6 ntu.
3. The 01E basin was also flowing with moderately turbid water.
4. The 01N basin was full but not overflowing at the time of the inspection.
5. N01, N02, N03, and N06 were flowing heavily with moderately turbid water. N04 was inaccessible on this day. The fencing was back in place at N05 and was flowing heavily with somewhat muddy water. N10 was flowing heavily also with more turbid water than most of the other outfalls.
6. At 007 the pond level was high and approaching the overflow point but a determined effort was underway to prevent an overflow. "Frac" tanks and tankers were being employed to remove water from the basin to keep the water level down. The oil skimmer was in service and the ISCO sampler was cooled to 5 °C inside the unit.
7. A major upgrade at 007 is planned where additional treatment involving chlorination for ammonia will be added to existing treatment. This change in treatment should be documented in an updated permit application so that the Division can determine what permit modifications, if any, are needed.

### Records, Self Monitoring, and Exceedances

1. Outfall 001 had a CBOD violation in a sample collected May 20, 2019. The result was 22.7 mg/l, a violation of the 20.0 mg/l daily maximum limit. This also influenced the monthly average so that it violated the 10.0 mg/l monthly average limit with an average value of 11.4 mg/l. The source of the exceedance was never determined and subsequent analyses were in compliance.
2. No further violations at the North Plant were noted going back at least through 2018.

3. The Stormwater Pollution Prevention Plan/Best Management Practices document was available. It was re-certified August 20, 2019.
4. Records were available and well organized.

## **South Plant**

### **Permit**

The Central Office has also for this permit just issued a minor modification transferring the permit from Arconic, Inc. to Arconic Tennessee, LLC, reflecting a change in ownership. NPDES Permit TN0065081 covers the South Plant including industrial wastewater from Outfall 006 and industrial storm water runoff from Outfalls SW4, SW6 and S03.

### **Site Review**

1. At outfall 006 there was a high flow discharging, the water was muddy in appearance. The platform at the outfall was partially submerged. The ISCO unit had been recently repaired.
2. Outfall SW4 was flowing.
3. The can reclamation area is no longer serving in that capacity. Processing of used beverage cans has been discontinued in favor of higher grade aluminum scrap from other sources. This area formerly was a chronic housekeeping challenge.
4. We looked at the Alcoa, Corp. S06 basin, which was muddy on this heavily rain-influenced day. This is part of the formerly unified Alcoa South Plant site which is now permitted separately to a different successor company but has the ability to impact Arconic's outfalls.

### **Records, Self Monitoring, and Exceedances**

1. No violations were noted going back at least through 2018. There were problems experienced with biomonitoring at 006 in December, 2018, due to excessive rainfall and June, 2019, due to pathogen interference but the tests were repeated and satisfactory results obtained.
2. As noted for the North Plant, the Stormwater Pollution Prevention Plan/Best Management Practices document was available. It was re-certified August 20, 2019.
3. As noted for the North Plant, records were available and well organized.

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## **Conclusion**

The plants have been found to be in compliance with NPDES Permit requirements.

Thank you for your cooperation with our Division. Should you have any questions concerning this inspection or if we may be of any further assistance to you in any way, please feel free to call me at (865) 594-5521.

Sincerely,

A handwritten signature in blue ink that reads "Woodson L. Smith". The signature is written in a cursive style with a large, sweeping initial "W".

Woodson L. Smith  
Division of Water Resources