

Erich Webber

From: Strickland, Shane C. <shane.strickland@arconic.com>
Sent: Friday, October 1, 2021 11:04 AM
To: Erich Webber
Cc: Belleau, Devin (Mesa); Ebune, Guilbert E; Strickland, Shane C.
Subject: [EXTERNAL] TN0067199 - 001 PCB NC 9/3/21

Follow Up Flag: Follow up
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Erich,

During the collection period in September for Outfall 001, we were notified from contract lab Eurofins/TA of an elevated PCB grab sample result above the laboratory reporting limit of 0.100 ug/L again. We requested the laboratory complete a thorough data quality review and re-run the additional duplicate PCB grab sample in house. On 9/30/21, we were notified by Eurofins/TA that the second data quality review was completed, as well as the analysis on the duplicate sample, and both results were validated at 0.186 ug/L and 0.137 ug/L for Aroclor 1248 versus a permit limit of 0.00128 ug/L (Daily Maximum) and 0.00064 ug/L (Monthly Average).

Since these results were above the laboratory reporting limit of 0.100 ug/L, exceeding both the monthly average and daily max, this will constitute (2) non-compliances when reported in the September 2021 NetDMR's.

One of the major contributing factors on this result is the significant rains prior (~3" within 72hrs) of sampling event and we saw ~10" rain in August and this was unprecedented to see over 15% of our annual rainfall in one month. Our belief is that the high level of run-off could have scoured the sewer lines and released higher solids during these repeated rain events in August.

We will continue to review past data and work with our Corporate Compliance Group to update our action plan and will follow-up with additional details with TDEC.

If you require any additional information, then please let me know.

Thanks,
Shane

Shane Strickland
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From: Erich Webber <Erich.Webber@tn.gov>
Sent: Wednesday, May 19, 2021 8:56 AM
To: Belleau, Devin D. <Devin.Belleau@arconic.com>
Subject: EXT: RE: TN0067199 - 001 PCB NC 3/3/21 - Follow up

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Thanks Devin. Glad to hear that things are improving. Have a good day!

From: Belleau, Devin D. <Devin.Belleau@arconic.com>
Sent: Tuesday, May 18, 2021 4:28 PM
To: Erich Webber <Erich.Webber@tn.gov>
Cc: Belleau, Devin D. <Devin.Belleau@arconic.com>
Subject: [EXTERNAL] TN0067199 - 001 PCB NC 3/3/21 - Follow up

Erich,

I just wanted to give you an update of the items we've completed to date including additional analytical samples collected (sheet-flow) into storm drains on 5/4/21.

In addition, I've included PCB results from Outfall 001 collected on 5/3/21 as well that documents compliance with permit limits (all PCB's ND).

At this point, it appears that any prior influences we observed in March from the Bldg 810 rail work have dissipated as we are no longer seeing detectable quantities of PCB's at any of the Outfall 01N discharges or Outfall 001.

Thanks,
Devin

Devin Belleau
Arconic-Tennessee Operations
865-977-2403 office
315-842-1786 cell



From: Belleau, Devin D.
Sent: Friday, April 23, 2021 1:09 PM
To: Erich Webber <Erich.Webber@tn.gov>
Subject: TN0067199 - 001 PCB NC 3/3/21 - Follow up

Erich,

As I mentioned during your site visit on 4/20/21, we (Arconic) scheduled a meeting on 4/22/21 to review recent results from our 001 PCB track down and discuss "next steps" as it relates to managing the recent non-compliance at 001 on 3/3/21.

Below, are some items that we discussed yesterday with our Corporate Compliance Group:

- 1) Review recent results with Arconic Corporate Remediation Work Group (RWG) and determine if there are any legacy sources or plume areas that could be impacting the O1N watershed.
- 2) Determine if source of PCB's is originating from sheet-flow (surface) or from groundwater (sub-surface integrity issues/contaminated sediments) – 1st round of samples on 3/22/21 and 4/1/21 were from combined surface/sub-surface sources, need to collect samples of just sheet flow as it enters some of the previously sampled manholes.
- 3) Investigate targeted line rinsing from areas just south of WWTF (Bldg 840) manholes to the O1N North and West (Upper/Lower) legs by flushing lines with city water and placing a vac truck at the downstream location to collect waters so they don't impact Outfall 001 downstream. Note: These waters can be taken to Outfall 007 for carbon treatment per our NPDES permit (TN0067199).
- 4) Using a CCTV remote camera, investigate the viability of recording the O1N legs (from where they exist to open concrete ditches) up through the underground lines by NICT to manholes in the road just south of WWTF (Bldg 840). This video would be used to determine if heavy sediments and/or line integrity issues exists that could be causing downstream PCB contamination.
- 5) Clean 001 Basin – This is usually an annual event which requires considerable coordination by several CSO utilities, Pit Crew, WM, etc., and takes several weeks to plan and execute.

I've also attached a water-shed drawing that I shared with you on Tuesday that summarizes all the testing and locations sampled to date.

Again, I appreciate you and the agencies cooperation as we continue to investigate this further.

Thanks,
Devin

Devin Belleau

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From: Zachariah Seiden <Zachariah.Seiden@tn.gov>
Sent: Friday, March 26, 2021 1:30 PM
To: Belleau, Devin D. <Devin.Belleau@arconic.com>
Cc: Erich Webber <Erich.Webber@tn.gov>
Subject: EXT: RE: TN0067199 - 001 PCB NC 3/3/21

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Hi Devin,

Thank you for the email and follow-up call. I appreciate your diligence and report on this issue. As we discussed, Blount County has been reassigned to Erich Webber (cc'd). He will be able to assist in discussing the changes in WQS and how it will impact the permit.

I hope you have a great weekend,
Zachariah



Zachariah T. Seiden, P.E. | Environmental Protection Specialist 2
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From: Belleau, Devin D. <Devin.Belleau@arconic.com>
Sent: Friday, March 19, 2021 3:48 PM
To: Zachariah Seiden <Zachariah.Seiden@tn.gov>
Subject: [EXTERNAL] TN0067199 - 001 PCB NC 3/3/21
Importance: High

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Zachariah,

As a follow up to our call this afternoon, I just wanted to provide you with a courtesy email with written details of our discussions for your records.

As required in our NPDES permit (TN0067199), a grab sample was collected from Outfall 001 for PCB's on 3/3/21. On Sunday 3/14/21 at 11:20pm, our contract lab Eurofins/TA notified us of an elevated PCB result above the laboratory reporting limit of 0.100 ug/L. On Monday morning 3/15/21 at 1:42 am, we requested the laboratory complete a thorough data quality review and re-run the additional duplicate PCB grab sample in house that was collected on 3/3/21 which was still within holding time. On 3/19/21, we were notified by Eurofins/TA that the second data quality review was completed, as well as the analysis on the duplicate sample, and both results were validated at 0.277 ug/L and 0.203 ug/L for Aroclor 1248 versus a permit limit of 0.00128 ug/L (Daily Maximum) and 0.00064 ug/L (Monthly Average).

Since these results were above the laboratory reporting limit of 0.100 ug/L, exceeding both the monthly average and daily max, this will constitute (2) non-compliances when reported in the March 2021 NetDMR's.

In addition, it is our belief, since we haven't seen a detectable PCB result at this location in the past that the contributing factors resulting in this non-compliance are as follows:

1. For the month of March, the local area near our facilities has received over 4" of rain to date and many of our watershed areas are saturated resulting in the potential for wet weather influence during sample collection. As referenced in our permit, samples are to be collected during dry weather conditions, i.e., no rain >72 hrs prior to any preceding weather event. Clearly, with the frequency of rain events in our area its been difficult to obtain truly "dry weather" events.
2. Prior to Sept 2019, our contract laboratory had historically used EPA Method 608 with a detection limit of 0.500 ug/L which was identified in our NPDES permit TN0067199, and the TN Water Quality Standard (WQS), as acceptable per the following permit footnote; "All quantified levels of PCB's will be reported. Analytical results as not detected at or above the method quantification level are considered to be in compliance with the permit, provided the method quantification level achieved is equal to or less than the TN WQS required level of 0.5 ug/L". On Sept 11, 2019, TDEC published an updated WQS which removed the 0.5 ug/L PCB reporting limit in the RRL tables and required all TN permittees use the most sufficiently sensitive method for PCB's as outlined in

40 CFR Part 136 (EPA Method 608.3). Since this time, our laboratory has been using EPA Method 608.3 with a reporting limit of 0.100 ug/L for all our required PCB samples. Further, if we were still operating under the TN WQS (prior to 2019) these results (0.277 and 0.203 ug/L respectively) would have been reported as <0.5ug/L and in compliance with our permit limits. That said, going forward we may find other TN permittees struggling with the potential impact of these changes as well.

We've also initiated some additional upstream sampling (3/15/21) to determine potential sources from the two primary water sources entering the 001 basin/outfall. Depending on these results, we may decide to conduct further sampling to determine if any potential sources for low level PCB's exist contributing to this outfall.

For your convenience, I've attached a copy of the revised analytical report that includes the original result as well as the re-extracted/analyzed sample duplicate that was within holding time.

If you require any additional information, then please let me know.

Thanks,
Devin

Devin Belleau
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