



Tennessee Operations
Aerospace and Automotive Products
2300 North Wright Road
Alcoa, TN 37701-3141 USA

ELECTRONIC COORESPONDENCE

October 27, 2023

Tennessee Department of Environment & Conservation
Division of Water Resources
Att: Sarah Snyder
3711 Middlebrook Pike
Knoxville, TN 37921

Re: TN0065081 – 06A ALUMINUM NON-COMPLIANCE, SEPTEMBER 2023

Dear Ms. Snyder:

As required by Arconic US, LLC – South Plant’s National Pollutant Discharge Elimination System (NPDES) permit (TN0065081), two (2) grab samples were collected from Outfall 06A. The samples were analyzed for the presence of total Aluminum by the facility’s contract lab “Eurofins US” using test procedures that conform to regulations under 40 CFR § 136 and state rule 0400-40-03-05(8). Grab samples were collected by the facility’s on-site contractors “Nalco” on 9/5/23 and 9/19/23 respectively. The facility was alerted via email of available results for each sample on 9/18/23 and 10/5/23.

The effluent limitations in TN0065081 for total Aluminum at the subject outfall are 22.3 lbs/day daily maximum and 9.91 lbs/d monthly average. The facility utilizes a digital flow meter that provides instantaneous “gallons per minute” readings, as well as a cumulative “million gallons per day” reading totalizer that is automatically logged in at 11:59 PM each night. For the purposes of “representative sampling” in accordance with section 1.2.1 of TN0065081, the facility records the instantaneous GPM reading and attributes that flow when calculating the effluent discharge. The GPM reading on the days of collection were record by Nalco as 25 GPM and 169 GPM for 9/5/23 and 9/19/23 respectively. Totalizer flows for the previously mentioned dates were recorded at 0.0725 MGD and 0.0574 MGD respectively.

After discussion with plant operators, it was discovered that the South Ingot Cooling Tower (SICT) where outfall 06A is located, was in fact in recirculation mode for an annual cleaning operation at the time the sampling took place. The flow rate is greatly increased to assist with the cleaning of the SICT basin during this time, which would explain the higher GPM flow rate noted by the Nalco contractors. At the time of sampling, this outfall was not discharging to its typical downstream location of Pistol Creek but was in recirculation within the confines of the facility.

It is of our professional opinion and judgment, that this sampling event conducted on 9/19/23 should be considered “Outlier Data” as demonstrated in section 1.3.5 of TN0065081. We are also requesting that we be allowed to modify our EPA NetDMR report that was submitted on 10/13/23 which erroneously added values for which we are now considering to be outlier data.

In the meantime, if you have any questions or would like to discuss, please contact Ryan Hennessey at 865-977-2403 or ryan.hennessey@arconic.com with any questions.

SENSITIVE



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Sincerely,

A handwritten signature in blue ink, appearing to read "Ryan Hennessey", written over a light blue horizontal line.

Ryan Hennessey
Environmental Engineer
Tennessee Operations