

Erich Webber

From: Zachariah Seiden
Sent: Friday, March 26, 2021 1:30 PM
To: Belleau, Devin D.
Cc: Erich Webber
Subject: RE: TN0067199 - 001 PCB NC 3/3/21

Follow Up Flag: Follow up
Flag Status: Flagged

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



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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

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