



State of Tennessee
Department of Environment and Conservation

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February 28, 2023

Mr. Jeff Weida
Plant Manager
2300 North Wright Road
Alcoa, Tennessee, 37701

RE: **Compliance Evaluation Inspection (non-sampling)**
Arconic US LLC – South Plant
NPDES permit #TN0065081
Blount County, Tennessee

Dear Mr. Weida:

On February 22, 2023, Brad Antone of the Division of Water Resources (The Division), performed a routine compliance evaluation inspection (CEI) at Arconic US LLC – South Plant to evaluate compliance with National Pollution Discharge Elimination System (NPDES) Permit #TN0065081. The inspection consisted of a records review from February 6, 2021, to February 22, 2023, and a site walk-through. The Division appreciates Mr. Ryan Hennessey for providing information necessary to conduct this inspection, as well as a tour of the facility. The inspection results and findings have been summarized below.

I. Facility Description

This facility discharges industrial wastewater from Outfall 006 and industrial storm water runoff from Outfalls SW4, SW6, and S03 to various receiving waters through four permitted outfalls. The property is located at 300 North Hall Road, Alcoa, Tennessee 37701. Arconic US LLC – South Plant is identified as a secondary smelting and refining of nonferrous metals facility (SIC 3341).

II. Permit

NPDES Permit # TN0065081 authorizes Arconic US LLC – South Plant to discharge industrial wastewater from Outfall 006 and SW6 into Pistol Creek at mile 4.7, and industrial storm water runoff from Outfalls SW4 at Pistol Creek at mile 7.0, and industrial storm water runoff from S03 into an unnamed pond on Arconic property. There are no other authorized discharges covered under this permit.

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The current NPDES discharge permit is effective from 2/1/2023, to December 31, 2027. The inspection covers a period under the previous permit, which contains different requirements than the current permit. When reviewing the remainder of this report, it may be necessary to review the previous permit if differences arise. Because the new permit went into effect on February 1, 2023, there were no discharge monitoring reports (DMRs) available for review.

III. Records/Reports

This facility maintains a current copy of the permit on the premises. A review of the previous three years of DMRs was conducted. Records are maintained in a neat and easily auditable fashion. This facility missed sampling in September of 2022. An internal Non-Compliance statement was provided with root cause analysis, immediate actions taken to correct the deficiency, and countermeasures to prevent reoccurrence. Since then, the facility has had no other issues with missed samples or effluent limit exceedances.

The Best Management Practices (BMP) plan was reviewed and determined to be adequate and in compliance with part IV of permit requirements. The Division would like to remind Arconic US LLC that with the new permit, a thorough review of the BMP plan should be conducted to address any changes to requirements.

The Stormwater Pollution Prevention Plan (SWPPP) was reviewed and determined to be adequate and in compliance with Part V of permit requirements. The last revision to the SWPPP was in December 2020 and the last corporate signature was from December 2020. This plan should also be reviewed and amended as necessary to meet new permit requirements.

IV. Facility Site Review, and Operation and Maintenance

During normal operations, cooling tower blowdown water, as well as all industrial stormwater runoff is discharged through 06A into a treatment basin. Prior to water being discharged through Outfall 006, it is treated in this treatment basin with sulfuric acid and sodium bisulfate for pH adjustment. Additionally, aerators are used to increase dissolved oxygen (DO).

Stormwater runoff is flowed through Outfalls SW4, SW6, and S03. When a wet weather event is occurring, the facility conducts sampling of these outfalls as required.

V. Sampling, Laboratory, and Flow Measurement

Arconic US LLC – South Plant maintains a Narco (a subsidiary of Ecolab) representative on site for all sampling requirements. Onsite sampling includes DO, pH, chlorine residual, and flow. Samples are sent to Eurofins for analyzing all other required parameters.

All samples appear to be correctly obtained and chain of custody completed per permit requirements. The facility uses an ISCO composite sampler, which is appropriately set up for flow-proportion mode. At the time of the inspection, the backup thermometer in the sampler was

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submerged in water but was not calibrated. The operator indicated that the sampler thermometers are replaced approximately every six months. The Division recommends including a label on the thermometers to indicate the purchase date of the thermometer to provide documentation that the thermometer is correctly calibrated within the required one-year timeframe.

VI. Effluent and Receiving Waters

Effluent at the outfalls were clear and free of any distinctly visible floating solids, scum, foam, oily slick, or formation of slimes, bottom deposits, or sludge banks of such size or character that may be detrimental to fish and aquatic life.

The stream bank at Outfall 006 appeared to be in normal conditions.

All outfall signs were verified in place and accurate.

VII. Conclusion and Recommendations

The inspection indicates Arconic US LLC – South Plant is in compliance with the requirements of their permit. The Division would like to thank Mr. Ryan Hennessey for the welcoming atmosphere and tour of the facility.

The Division is transitioning to sending correspondence via email. This CEI report will only be sent via email unless a paper copy is requested. Should you have any questions, please do not hesitate to call me at (865) 323-8650 or email at Brad.Antone@tn.gov.

Sincerely,

A handwritten signature in blue ink that reads "Brad Antone". The signature is cursive and stylized.

Brad Antone, Environmental Scientist 2
Knoxville Environmental Field Office
Division of Water Resources
Email: Brad.Antone@tn.gov

cc: Nashville Central Office – via WaterLog Database
Shane Strickland – EHS Manager, Arconic – Via email
Ryan Hennessey – Environmental Engineer, Arconic – Via email