



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 - North Plant  
NPDES permit #TN0067199  
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 – North Plant to evaluate compliance with National Pollution Discharge Elimination System (NPDES) Permit #TN0067199. 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 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 to various receiving waters through 17 permitted outfalls. The property is located at 2300 North Wright Road, Alco, Tennessee 37701. Arconic US LLC – North Plant is identified as an Aluminum sheet, plate, and foil facility (SIC 3353).

## **II. Permit**

NPDES Permit # TN0067199 authorizes Arconic US LLC – North Plant to discharge industrial wastewater and groundwater from Outfall 001 into Duncan Creek at mile 0.6, industrial wastewater, landfill leachate and storm water runoff from Outfall 007 into unnamed tributary to Russell Branch at mile 2.2, industrial wastewater and storm water runoff from SW1 into Duncan

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Creek at mile 0.6, and storm water runoff from 01N, 01S, 01E, N01-N06, and N08-N12 at various wet weather discharge points along Duncan Creek and Russell Branch. There are no other authorized discharges covered under this permit.

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 had PCB violations in September 2021, January 2022, and March 2022, which resulted in a Notice of Violation (NOV) being issued by the State. Prompt action was taken to address PCB issues and there have been zero violations since.

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, all outfalls on the property except for outfall 007, flow through Outfall 001(SW1). Prior to water being discharged through Outfall 001(SW1), it is treated in a treatment basin. Sulfuric acid and sodium bisulfate are used for pH adjustment, aerators are used to increase dissolved oxygen (DO), and a lasso-type oil removal system is employed. If necessary, effluent may be pumped back to the onsite wastewater treatment facility.

If necessary, and in unlikely scenarios, water from all other outfalls (except for 007) may be diverted directly to receiving streams provided the effluent meet effluent limitations per the permit.

Outfall 007 receives water from a depressed area that was historically used for oil dumping. Because of the nature of runoff from this area, water is treated similarly to that of Outfall 001, but also includes nitrification, and filtration through a sand filter and a carbon filter.

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## **V. Sampling, Laboratory, and Flow Measurement**

Arconic US LLC – North 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 not submerged in water, was not calibrated, and did not match the reading from the sampler. 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.

A handheld pH analyzer is used to conduct compliance sampling. At the time of the inspection, the pH 4.0 buffer was expired. Ensure that all buffers are within required expiry dates.

## **VI. Effluent and Receiving Waters**

Effluent at both 001 and 007 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 001 is eroded due to livestock on the premises, and does not appear to be caused in any way by effluent from the facility

All outfall signs were verified in place and accurate with the exception of Outfall 01N, which appears to have been blown over by natural winds. This sign needs to be repaired as soon as feasible.

## **VII. Conclusion and Recommendations**

The inspection indicates Arconic US LLC – North 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.

Mr. Jeff Weida  
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Sincerely,

A handwritten signature in blue ink that reads "Brad Antone". The signature is written in a cursive style with a large initial "B".

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