

**From:** [Julie Harse](#)  
**To:** [Elizabeth Rorie](#)  
**Subject:** FW: Albemarle New Johnsonville (NPDES Permit TN0062537) TDEC MAO Notification  
**Date:** Wednesday, December 13, 2017 3:13:19 PM

---

[Upload letter.](#)

---

**From:** Darrell.Fisher@albemarle.com [mailto:Darrell.Fisher@albemarle.com]  
**Sent:** Thursday, December 7, 2017 4:33 PM  
**To:** Julie Harse  
**Cc:** Lee Bagby; Robert Crowley; Randy.Reed@albemarle.com; John.Stewart@albemarle.com  
**Subject:** Albemarle New Johnsonville (NPDES Permit TN0062537) TDEC MAO Notification

**\*\*\* This is an EXTERNAL email. Please exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email - STS-Security. \*\*\***

Dear Ms. Harse

Please find attached a notification letter regarding Albemarle's New Johnsonville Site NPDES permit TN0062537. I have also sent this to your attention via certified letter.

Regards,  
Darrell Fisher

**Darrell Fisher** |  | Operations Director Butyllithium & Specialties | 856 Foote Lane, New Johnsonville, TN 37134  
| 📞: 931.535.6201 | 📠: 615.522.8976 | ✉️: [Darrell.Fisher@albemarle.com](mailto:Darrell.Fisher@albemarle.com) | [www.albemarle.com](http://www.albemarle.com)



[www.albemarle-lithium.com](http://www.albemarle-lithium.com)

Please note that Rockwood Lithium has changed its brand to Albemarle and the legal company name from Rockwood Lithium Inc. to Albemarle U.S., Inc.  
The e-Mail address of our users has now changed from [@rockwoodlithium.com](mailto:@rockwoodlithium.com) to [@albemarle.com](mailto:@albemarle.com).

Make sure to update **your local directories**, master data and other files with the new e-Mail address and company name.

This e-mail and all attachments transmitted may contain confidential or legally privileged information. If you are not the intended recipient (or have received this e-mail in error) please notify the sender immediately and delete this e-mail. Any unauthorized copying, disclosure or distribution of the information contained in this e-mail or its attachments is strictly forbidden.



Ms. Julie Harse  
Tennessee Department of Environment and Conservation  
Division of Water Resources  
312 Rosa L. Parks Ave.  
Nashville, TN 37243  
Via email at Julie.Harse@tn.gov

Dear Ms. Harse,

Albemarle in New Johnsonville (NPDES Permit TN0062537) will begin a new operation, cleaning and deactivating returned portable tanks from customers, and shipping the portable tanks to another facility for refurbishment and reuse. These containers held methylaluminoxane (MAO) in a toluene solvent. The portable steel tanks have a capacity of either 430 or 250 gallons. Customers use the MAO/toluene product in their process and return the used containers to New Johnsonville. The residual wash water from the cleaning operation contains trace amounts of the toluene solvent.

The volume of wastewater from portable tank washing is expected to average about 300 gallons per day (0.0003 MGD) over a 5 day week. This is a negligible (0.7%) increase in the total volume of water discharged at outfall 001 which has averaged 0.043 MGD and is not expected to change measurably due to the container deactivation.

Based on the highest concentration of toluene in three samples from the deactivation process, we anticipate that toluene in the wastewater at the discharge point (outfall 001) would be approximately 50 ug/L, assuming the average volume of discharge and no losses due to volatilization. Losses are likely to occur due to surface volatilization in the pond and the reuse of water from the pond for filter/drum washing. This is a conservative estimate of the average toluene in the discharge.

Although toluene was identified as potentially present, the maximum toluene concentration reported with our last permit application was < 5 ug/L. NPDES Permit TN0062537, Part III. A. 1. requires notification for a routine activity that will result in a discharge of 25 ug/L (5 times the maximum concentration reported in the permit application); therefore there is a potential for toluene in the discharge to exceed 25 ug/L.

No discharge of this material to wastewater has occurred. However, we have begun processing these containers and are currently storing the residual wash water. We are providing notification as required by the permit and appreciate your timely review and comments before we begin to discharge this stream. If you have any questions, contact me, Darrell Fisher at (931) 535-3401 or by email at darrell.fisher@albemarle.com.

Sincerely,

Darrell Fisher  
Director of Operations, Butyllithium & Specialties