



NORTH CAROLINA  
*Environmental Quality*

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*Director*

May 17, 2022

Director of Asset Management Americas  
Badin Business Park LLC  
Highway 740  
P.O. Box 576  
Badin, NC 28009

Subject: Request for Additional Information  
NPDES Application NC0004308  
Badin Business Park

Dear Ms. Robyn L. Gross,

This office reviewed the renewal application for Alcoa (BBP) NPDES permit. Please find below the modifications required to proceed with the renewal process.

- In Form 2E, section 4, the mass is reported as “#/day” which seems to be a typo. Please correct it to correct units.
- Please expand on the source of Chlorine reported in Form 2E for outfall 005, while no treatment system exists. [Note: In the current permit there is a limit for total residual chlorine for outfall 005.]
- Please elaborate on section 5.2 of Form 2E, especially for the ones that list fire protection water. Please consult EPA Form 2E instructions.
- Please report any missing temperature or other parameters in section 4.2 of 2E Form. Please consult EPA Form 2E instructions.
- Please explain about your waiver request for lack of discharge in outfall 011 and 019, while the amended Form 2E of outfall 011 reported 9 MGD flow. The facility can wait for any related sample collection until end of high precipitation season (summer), but it is better to report the result as soon as possible.
- Per Form 2F section 4.3, no “control measure and treatment” exist for outfall 005. Considering the frequent violation of Fluoride (and some Cyanide violations) in the current permitting cycle, what actions has BBP taken or plans to take to meet the outfall limits? Per the DEQ discussion with BBP during in-person meeting on March 9th, 2022, in Archdale building, and per condition B.(2.)2.(a) of current permit a feasibility study can be done to evaluate contamination source reduction alternatives and end-of-pipe treatment alternatives.
- Please fill all missing items (or correct items) in tables A-D in Forms 2F (all outfalls, as applicable). Please consult and carefully follow EPA Form 2F instructions.
- During the site visit by DWR staff on March 22<sup>nd</sup>, we noticed train cars parked on the tracks as part of a lease to a third party. Please expand on the possible effects of this and other ancillary activities on stormwater from drainage areas (such as 2, 3 and 4) and corresponding outfalls.



North Carolina Department of Environmental Quality | Division of Water Resources  
512 North Salisbury Street | 1611 Mail Service Center | Raleigh, North Carolina 27699-1611  
919.707.9000

What Best Management Practices (BMPs) are in place to minimize the possible adverse effects on outfalls?

- Also, during the site visit the BBP staff mentioned about the rehabilitation needed for impoundment in brick closed landfill, discharging to outfall 019. Please elaborate on mentioned plans, and its possible effects on outfall 019.

Any possible required analysis should be done by a certified laboratory similar to those required by NPDES permits pursuant to 40 CFR 136.

We appreciate your kind attention to these matters and look forward to continuing to work with you on this permit renewal. To avoid unnecessary delays please remember per 15A NCAC 02H .0107(b), additional information must be provided within 60 days of request. Pending review and evaluation of provided information, further action or additional information may be required.

If you have any questions, please contact at 919-707-3704 or email at Amir.Adaryani@ncdenr.gov.

Sincerely,

DocuSigned by:  
  
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Amirhossein (Amir) Rezaei Adaryani, PhD  
Environmental Engineer I  
Industrial NPDES Permitting Unit

cc: NPDES Files [Laserfiche]  
Douglas Dowden [doug.dowden@ncdenr.gov]  
Mooresville Reginal Office/Water Quality, Corey Basinger [corey.basinger@ncdenr.gov]  
Anna Gurney [anna.gurney@ncdenr.gov]

