

Ongoing NPDES Concerns with Alcoa BBP

November 16, 2022



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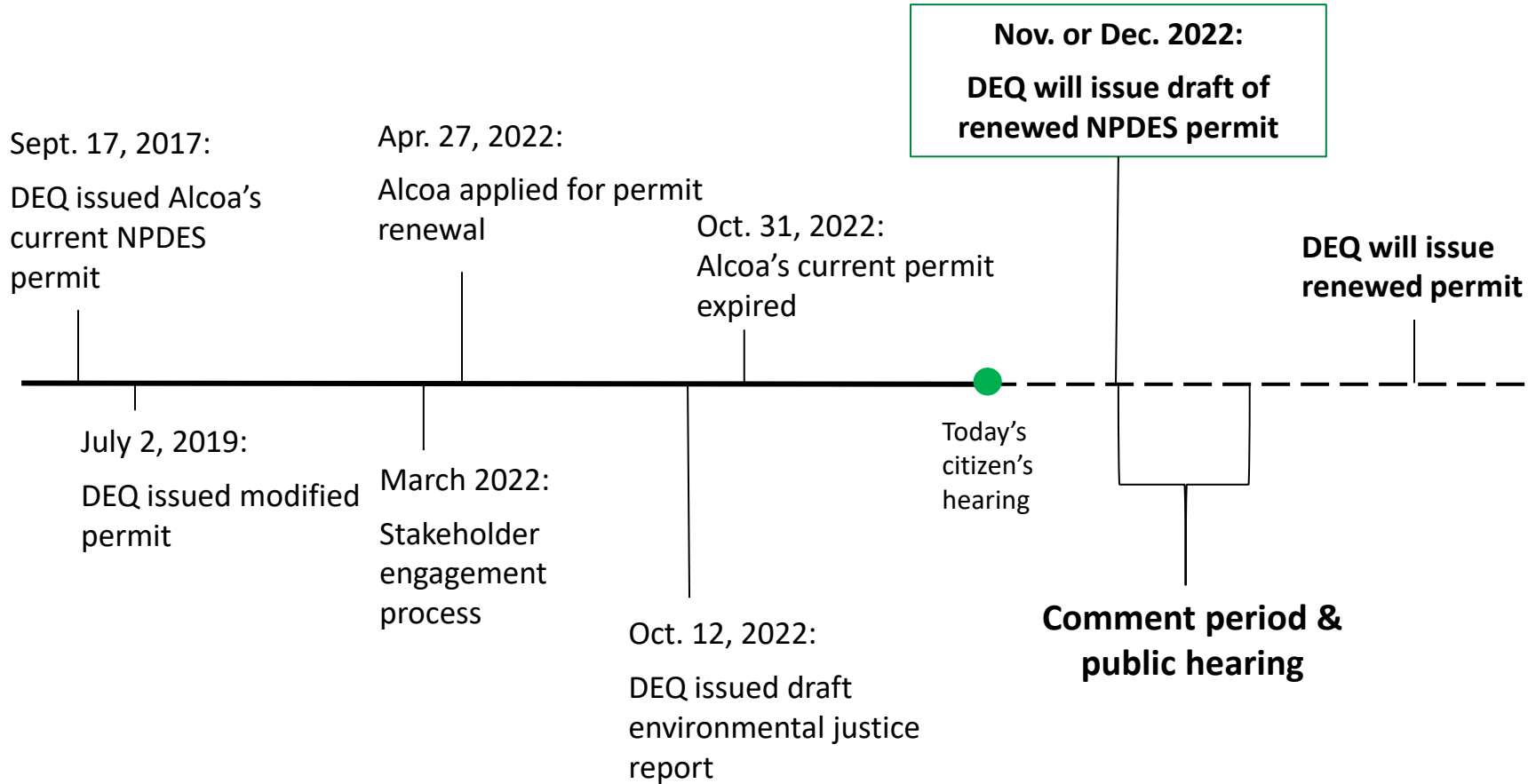
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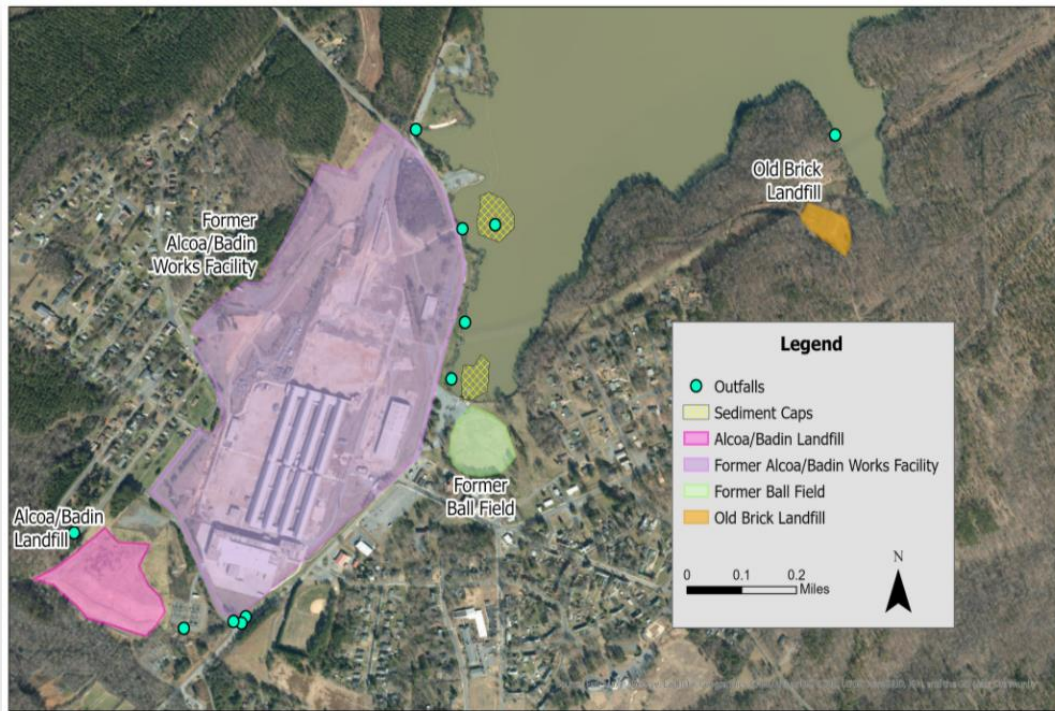
NPDES Permit Program

- National Pollution Discharge Elimination System permit
- Required under the Clean Water Act to discharge pollutants into U.S. waters
- Issued by NC Department of Environmental Quality (“DEQ”) Division of Water Resources
- NPDES permits cover:
 - What pollutants can be discharged,
 - Where they can be discharged, and
 - The quantity that can be discharged.

Alcoa's NPDES Timeline



Current Outfalls



Outfall ID	Outfall Description	Receiving Stream
002	Stormwater	Badin Lake
004	Stormwater	UT to Little Mountain Creek
005	Groundwater, stormwater and fire protection water	UT to Little Mountain Creek
011	Overflow from outfall 012	Badin Lake
012 (diffuser)	Groundwater, stormwater and fire protection water	Badin Lake
013	Stormwater, spring water and groundwater	Badin Lake
017	Stormwater	UT to Little Mountain Creek
018	Stormwater	UT to Little Mountain Creek
019	Pond overflow from the landfill cover drainage system collection pond. (No contact with the landfill material)	Badin Lake
020	Stormwater	Badin Lake
022	Stormwater	UT to Little Mountain Creek

Current Permit Overview

- Discharge contaminated water directly into Badin Lake and Little Mountain Creek through 11 outfalls
- Contaminated water is from land storing thousands of tons of untreated spent potliner
- **Monitoring** only required for **5** pollutants
- Discharge **limits** only set for 2 pollutants: cyanide and fluoride
- Does not require monitoring or set discharge limits for other known pollutants

Violations

- 16 violations of fluoride limit since August 2019
- 5 violations of cyanide limit since August 2019
- 2 exceedances of aluminum benchmarks in 2021

Penalties

- In 2019, one \$5,000 penalty
- In 2020, five penalties totaling \$2,325
- In 2021, two penalties totaling \$793

New NPDES Permit Demands

1. Full site clean up before any future permit applications
2. Better testing for contaminants:
 - Weekly testing for cyanide and fluoride;
 - Monitor for wider range of contaminants;
 - Use a certified lab that detects violations for all contaminants
3. Eliminate contaminants instead of diverting additional discharge into Little Mountain Creek
4. Eliminate discharges into public access and swimming areas
5. A public hearing before any permit renewal decisions

Next Steps

- Permit will be renewed this winter
 - DEQ has yet to release a draft permit
 - DEQ has released a draft environmental justice report for the upcoming permit
- We will demand a public hearing in Badin on the draft permit
- DEQ will have public comment period



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