



**Warrick Newco LLC**

Environmental Department  
4400 W State Road 66  
P.O. Box 10  
Newburgh, IN 47629-0010

**June 17, 2022**

**Via Electronic Mail Only**

[gchaddoc@idem.in.gov](mailto:gchaddoc@idem.in.gov)

Grant Chaddock, Senior Enforcement Case Manager  
Office of Water Quality IGCN 1255  
Indiana Department of Environmental Management  
100 North Senate Avenue  
Indianapolis, IN 46204-2251

**RE: Warrick Newco LLC NPDES No. IN0001155 Agreed Order Case No. 2020-27093-W  
Compliance Plan**

Dear Mr. Chaddock:

This letter is being submitted on behalf of Warrick Newco LLC ("Warrick") to respectfully request an extension of the June 30, 2022 and September 30, 2022 deadlines to complete the capital procurement and installation of pH control equipment and demonstration of compliance with the pH limits for Outfalls 403 and 303. Attached is a proposed revised Compliance Plan Schedule identifying the proposed new deadlines to complete those tasks.

These timeline extensions are necessary for a number of reasons. The process of refining the October 2021 system design to the point where equipment could be ordered has taken longer than expected, and additional time has been spent evaluating appropriate locations for it. In addition, Warrick is facing exceptionally long lead times for vendor responsiveness and delivery of the pH treatment system related to the ongoing global supply chain disruptions. We recently have learned that the equipment vendors are not able to provide the equipment until approximately March 2023 at the earliest.

The pH treatment system Warrick has selected will be large enough to handle a potential increase in the volume of wastewater from the rolling mill in future years thereby providing a high degree of confidence that compliance with the pH limits can be maintained at all times over the long term. Furthermore, the revised ultimate deadline to demonstrate compliance with the pH limits is consistent with other previously approved deadlines in the Compliance Plan Schedule.

For these reasons and in order to ensure sufficient time to finalize and install an appropriate pH control system, Warrick respectfully requests the extension of the two deadlines identified above in current Compliance Plan Schedule. Attachment A contains the revised Compliance Plan Schedule including the two new deadlines for the bottom two tasks identified in the revised Compliance Plan Schedule. Warrick is not requesting any other revisions to the Compliance Plan Schedule at this time.

Grant Chaddock  
June 17, 2022

If you have any question, please contact me at (812) 660-2602 or email at [thomas.shaw@alcoa.com](mailto:thomas.shaw@alcoa.com).

Sincerely,

A handwritten signature in cursive script that reads "Thomas Shaw".

Thomas Shaw, Ph.D.  
Manager Environmental  
Warrick Newco LLC  
Attachments – Attachment A

**ATTACHMENT A**  
**Revised Compliance Plan Schedule**

Warrick Newco LLC  
NPDES No. IN0001155  
Case No. 2020-27093-W

## Revised Compliance Plan Schedule of Activities

<b><u>Scheduled Activity</u></b>	<b><u>Due Date</u></b>
Complete design, capital procurement and installation of systems to reduce outfall discharges at Outfalls 004 and 005	June 30, 2021 <b>Completed</b>
Complete design, capital procurement and installation of equipment necessary to comply with discharges limitations for Mercury and Metals at Outfalls 004 and 005	December 31, 2023
Collect data necessary to apply for a Streamlined Mercury Variance (SMV) at Outfall 001	December 31, 2022
Complete and submit the SMV application to IDEM-OWQ for Outfall 001	June 30, 2023
Comply with the 12ng/l limit at Outfall 003	<b>Completed</b>
Complete design, capital procurement and installation of BTA for both impingement and entrainment identified as modified traveling screens in IDEM's May 27, 2020 email to Alcoa entitled "Alcoa Warrick 316(b) Information Review"	December 31, 2023
Complete detailed design for pH compliance at internal Outfalls 403 and 303	October 30, 2021 <b>Completed</b>
Complete capital procurement and installation of equipment for pH compliance at internal Outfalls 403 and 303	September 30, 2023
Demonstrate compliance with pH limits at internal Outfalls 403 and 303	December 31, 2023