

PROJECT CLARIFICATIONS

Elliott Ditch Reaches 4-6 Cleanup Project

Questions or Comments, Call 24 hours a day (317) 613-4514 or e-mail at ElliottDitchQuestions@gmail.com

The information presented below is to provide clarification to questions and comments that were raised during the Indiana Department of Natural Resources (IDNR) Construction in a Floodway Permit Application #: FW-32124-0 Public Hearing held at 5:00 PM EST on July 12, 2023, at the Tippecanoe County Office Building in Lafayette, Indiana. Arconic US LLC (Arconic) applied for the IDNR Construction in a Floodway Permit to perform the Elliott Ditch Reaches 4-6 Soil and Isolated Sediment Cleanup Project (Project).

Clarification 1: The IDNR Construction in a Floodway Permit authorizes Arconic to perform Project activities within the regulated floodway of Elliott Ditch. The Permit does **not** provide Arconic, its contractors, agents, or consultants access to private property to perform the cleanup work.

Clarification 2: Private property owners have the right to decline access to Arconic. Arconic can only request private property owners for access to perform delineation sampling and/or cleanup. Access is granted through an *Access and Use Agreement* signed by the private property owner and Arconic. Following the successful completion of the Project, the IDNR Construction in a Floodway Permit will be closed, and all *Access and Use Agreements* will be terminated.

Clarification 3: If further cleanup work is required within and along the banks of Elliott Ditch in the future, Arconic would obtain new regulatory permits and private property access to perform the work at that time.

Clarification 4: The Project is being solely funded by Arconic. Arconic has not received, nor will it receive in the future, financial benefit in performing the cleanup work. This includes federal, state, or local grants, tax write-offs or deductions, or funds from the American Rescue Plan or Inflation Reduction Act.

Clarification 5: The cleanup work performed by Arconic is not associated with or part of the City of Lafayette and Tippecanoe County flood control work planned or in progress along Elliott Ditch.

Clarification 6: Arconic obtained the necessary permits and regulatory agency approvals for the cleanup work performed in Reaches 1-3 Cleanup Project. Please refer to the “Repository” found at <https://elliottditchproject.cecinc.com/repository.aspx> for more information.

Clarification 7: The regulatory permits obtained by Arconic for cleanup along Reaches 1-3 prohibited altering the channel dimensions or slope of Elliott Ditch or the characteristics of the contributing watershed. Land survey data was collected before and after the completion of the clean-up work to document compliance with the issued permits.

Clarification 8: The amount of water Arconic Lafayette Operations (Facility) discharges to Elliott Ditch is directly related to the amount of precipitation it receives. The Facility uses Best Management Practices (BMPs) to store industrial stormwater runoff for treatment prior to discharge into Elliott Ditch. Please refer to Figures 1 below which summarize Facility discharge volumes compared to precipitation on a monthly basis from April 2020 through May 2023. This includes the timeframe leading up to performing the second and third phases of the Reaches 1-3 Cleanup Project, during execution, and after it was completed. The first phase of cleanup work occurred on the bank along the south side of Elliott Ditch. No in-ditch work occurred during this phase.

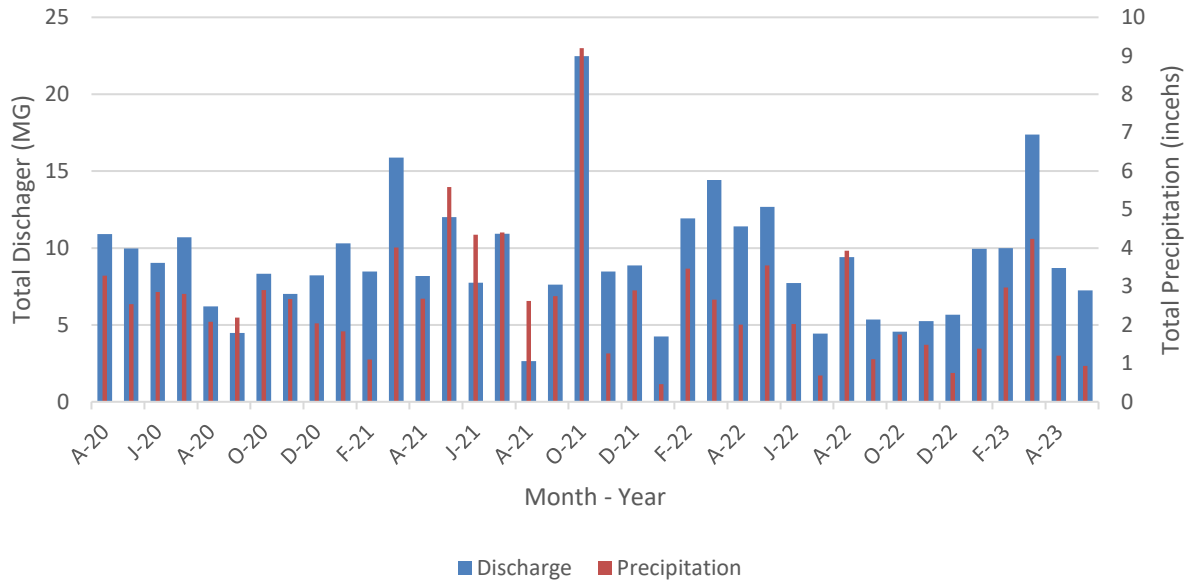


Figure 1. Monthly Precipitation vs. Facility Discharge Volume (April 2020 to May 2023)

Figure 1 above shows the amount of water discharged by the Facility to Elliott Ditch each month is directly related to the amount of precipitation it receives. Except for a wet October in 2021, the monthly precipitation totals in the area for 2021 through 2023 show a general trend toward dryer conditions. This results in less discharge from the Facility as well as other contributing sources in the watershed. Figure 2 below shows a summary of monthly precipitation totals for 2021 through July 2023 for Lafayette, Indiana. Over the last two and half years, monthly precipitation totals have declined.

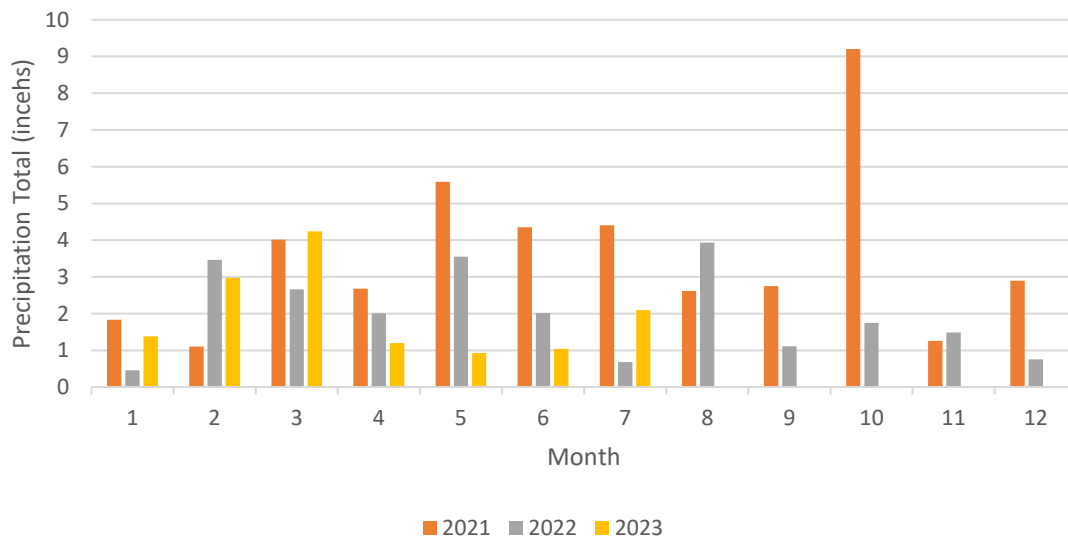


Figure 2. Monthly Precipitation Totals

The watershed contributing to Elliott Ditch, which includes the location of the Facility outfall, is approximately 12.5 square miles. The Facility includes an area of approximately 150 acres or 0.23 square miles which makes up less than 2-percent of the watershed. The vast majority of water Elliott Ditch receives is from other sources.

Clarification 9: Arconic is using geomorphic mapping to identify potential cleanup surfaces along Elliott Ditch. The mapping results used earlier in the Reaches 1–3 Cleanup Project proved to be an accurate and effective approach in identifying cleanup areas. A screening survey of the geomorphic surfaces, also referred to as

historic floodplain terraces, in Reaches 4-6 of Elliott Ditch occurred in late 2021 and early 2022. A land survey of Reaches 4-6 provided elevation data to map and confirm geomorphic surfaces along Elliott Ditch. Part of the screening survey included the collection of a limited number of soil samples from representative geomorphic surfaces. These samples provide an understanding of the geologic characteristics of soil and sediment deposits along Elliott Ditch. Some of the screening samples collected were submitted for polychlorinated biphenyls (PCBs) analysis. The results from this survey can be found in the *Elliott Ditch Reaches 4-6 Geomorphic Assessment Report (Geomorphic Assessment Report)* prepared by Civil & Environmental Consultants, Inc. (CEC) and dated November 2022.

Clarification 10: The next step in the clean-up process is to gain access to private property to validate and refine the cleanup footprints. This effort is complete in Reaches 5 and 6. Sampling work is needed to fully understand the potential cleanup footprints in Reach 4, as well as to identify and map mature trees and physical structures that might be impacted by cleanup efforts.

Clarification 11: The cleanup objective is 1.0 mg/Kg total PCBs for surface soils and sediment, as directed by the Indiana Department of Environment and Conservation (IDEM) and the U.S. Environmental Protection Agency (U.S. EPA), Region 5.

Clarification 12: Project documents can be found on the online Repository found at the following address <https://elliottditchproject.cecinc.com/repository.aspx>. The scope of work for this current phase is provided in the document titled *RCRA Corrective Action Interim Measures Work Plan, Elliott Ditch Reaches 4-6 Soil & Isolated Sediment Remediation (IM Work Plan)* prepared by CEC and dated February 2023. The Repository contains copies of the *IM Work Plan* and the *Geomorphic Assessment Report*.