



**ENVIRONMENTAL ASSISTANCE CENTER  
TENNESSEE DEPARTMENT OF ENVIRONMENT AND CONSERVATION  
SUITE E-645, PERIMETER PARK  
2510 MT. MORIAH ROAD  
MEMPHIS, TENNESSEE 38115-1520  
PHONE (901) 368-7939 STATEWIDE 1-888-891-8332 FAX (901) 368-7979**

April 2, 2004

CERTIFIED MAIL 7003 0500 0000 0591 4563  
RETURN RECEIPT REQUESTED

Mr. Greg Thomas  
A.S. Hospitality  
3493 Lamar Avenue  
Memphis, TN 38118

**Re: Notice of Non-Compliance  
A.S. Hospitality  
TMSP Permit # TNR050107  
Shelby County**

Dear Mr. Thomas:

On March 24, 2004, Maylynne Pynkala conducted a Compliance Evaluation Inspection (CEI) at the A.S. Hospitality facility. The following deficiency was revealed during the inspection.

1. Documentation of the quarterly visual inspections for storm water was not on file as required by the Tennessee Multi-Sector Storm Water Permit (TMSP). The TMSP requires that the facility have a thorough inspection checklist for its storm water.
2. A Storm Water Pollution Prevention Plan (SWPPP) written in November 1993 was on file. However, the plan needs to be updated at least every three years or whenever any changes occur at the facility.

A.S. Hospitality is in violation for non-compliance with the applicable TMSP permit requirements, as summarized above.

Please submit a written response to the Memphis Environmental Assistance Center (MEAC) **within 30 days** of your receipt of this letter detailing what steps the company has taken and/or will take to ensure compliance with its TMSP requirements.

If you have any questions regarding this correspondence, please contact me at (901) 368-7959 or Maylynne Pynkala at (901) 368-7997.

Sincerely,



Terry R. Templeton, P.G.

Manager

Division of Water Pollution Control

c: Chris Moran, Enforcement and Compliance, DWPC-NCO  
File – TDEC/DWPC/MEAC

**U.S. Postal Service™**  
**CERTIFIED MAIL**

7

**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits. **WPC**

1. Article Addressed to:

**Greg Thomas**  
**A.S. Hospitel**  
**3493 Lamar Ave**  
**Memphis TN 3818**

2. Article Number

(Transfer from service label)

PS Form 3811, August 2001

Domestic Return Receipt

102595-02-M-1540

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature ☒ Agent ☐ Addressee

B. Received by (Printed Name) **Greg Thomas** C. Date of Delivery **4-5-04**

Is delivery address different from item 1? ☐ Yes ☐ No  
If YES, enter delivery address below:

3. Service Type

☒ Certified Mail ☐ Express Mail  
☐ Registered ☐ Return Receipt for Merchandise  
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee) ☐ Yes

**7003 0500 0000 0591 4563**



**TO:** Mr. Terry Templeton

**FROM:** AS Hospitality (Greg Thomas)

**DATE:** 4/19/04

**SUBJECT:** compliance requirements permit #TNR050107

APR 22 2004

Dear Mr. Templeton

Since Maylynne's inspection of AS Hospitality on 3/24/04 we have updated our SWPPP to reflect personnel changes and have brought it up to date. We have also outlined a quarterly visual inspection report (see attached). This should resolve all issues of non-compliance and return AS Hospitality to good standings in all areas of the TENNESSEE DEPARTMENT OF ENVIROMENTAL AND CONSERVATION.

In addition we have decided to pursue the recommendation of Maylynne to apply for

A NO EXPOSURE CERTIFACATION. I have downloaded the paperwork and have sent it to Nashville.

Thank you

For all your and Maylynne's help

*Greg Thomas  
Maintenance Supervisor / Safety Director  
AS Hospitality  
901-365-4742  
901-362-7811 Fax*

## Outfall Inspection Checklist

Facility Name and Address

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Date of Inspection \_\_\_\_\_ Time of Inspection \_\_\_\_\_

Weather Conditions:

\_\_\_\_\_  
\_\_\_\_\_

1. Outfall Number \_\_\_\_\_

2. Type (concrete, pipe, grassed, rock, etc.) \_\_\_\_\_

3. Location \_\_\_\_\_

4. Visible Flow? \_\_\_\_\_ If yes, complete (a-k). If no, go to #5.

- a) Color of Water \_\_\_\_\_
- b) Odor \_\_\_\_\_
- c) Murky? \_\_\_\_\_
- d) Floating Objects? \_\_\_\_\_
- e) Scum? \_\_\_\_\_
- f) Suds? \_\_\_\_\_
- g) Oily Sheen? \_\_\_\_\_
- h) Sludge Present? \_\_\_\_\_
- i) Stains on conveyance? \_\_\_\_\_
- j) Plant life present and healthy? \_\_\_\_\_
- k) Estimate flow rate or quantity of standing water: \_\_\_\_\_

5. Standing water present? \_\_\_\_\_ If yes, complete (a-k). If no, go to #6.

- a) Color of Water \_\_\_\_\_
- b) Odor \_\_\_\_\_
- c) Murky? \_\_\_\_\_
- d) Floating Objects? \_\_\_\_\_
- e) Scum? \_\_\_\_\_
- f) Suds? \_\_\_\_\_
- g) Oily Sheen? \_\_\_\_\_
- h) Sludge Present? \_\_\_\_\_
- i) Stains on conveyance? \_\_\_\_\_
- j) Plant life present and healthy? \_\_\_\_\_
- k) Estimate flow rate or quantity of standing water: \_\_\_\_\_

MU 5/27/93  
Phoned, NO EXT.  
GIVEN, FULL REQUIREMENTS  
EXPLAINED. Spoke with  
MR. WARREN.



A S Hospitality 3493 Lamar Ave.  
Memphis, TN 38118 (901) 365-4742

RECEIVED  
MAY 27 1993

May 25, 1993

Department of Environment and Conservation  
Division of Water Pollution Control  
6th Floor L&C Annex  
401 Church St  
Nashville, TN 37243-1534

Re: TNROD-0107

Director:

I would like to request for an extension for submitting our company's plan for Storm Water Pollution Prevention.

The reasons for requesting the extension is that I just became aware of the requirements after receiving your packet postmarked April 20, 1993. Our company is going through a major reorganization and restructuring. We are selling off \$3MM of our business and we have recently had to terminate the President and Controller.

Needless to say, day to day operations are very hectic. Honestly the survival of our business is at risk and which presents the need to focus all my time and energy on fixing our problems or we won't have a business in a few months.

Therefore, to fully prepare and present our Pollution Prevention Plan (which is indeed a very important issue) I would respectfully request for an additional 6 months extension before my plan is due in your office.

Respectfully yours,

Joe W Warren  
Vice President Manufacturing



TENNESSEE DEPARTMENT OF ENVIRONMENT AND CONSERVATION  
**STORM WATER MONITORING REPORT**  
MONITORING YEAR 10/01/92 TO 09/30/93

PAGE 1 OF 1

FACILITY NAME AS HOSPITALITY  
ADDRESS 3493 LAMAR  
CITY MEMPHIS COUNTY SHELBY

NPDES PERMIT NUMBER TNR00 0107  
CONTACT PERSON JOE WARREN  
PHONE NUMBER (901) 365-4742

TOTAL NUMBER OF FACILITY OUTFALLS THAT CONVEY "STORM  
WATER DISCHARGES ASSOCIATED WITH INDUSTRIAL ACTIVITY":

-0-

TOTAL NUMBER OF ABOVE OUTFALLS SAMPLED DURING THE MONITORING YEAR :

-0-

TOTAL NUMBER OF STORM EVENTS SAMPLED :

-0-

**Note: Read instructions on back  
before completing this form.**

PROVIDE THE FOLLOWING INFORMATION FOR EACH OUTFALL SAMPLED THIS YEAR:

- A.....DRAINAGE AREA OF OUTFALL  
B.....PERCENTAGE OF DRAINAGE AREA DEFINED AS INDUSTRIAL ACTIVITY  
C.....PERCENTAGE OF DRAINAGE AREA ON YOUR PROPERTY CONSISTING OF IMPERVIOUS SURFACES (CONCRETE, PAVEMENT, ROOF, PONDS)  
D.....PERCENTAGE OF DRAINAGE AREA ON YOUR PROPERTY CONSISTING OF VEGETATION (FOREST, LAWN, FIELD)  
E.....PERCENTAGE OF DRAINAGE AREA CONSISTING OF GRAVEL OR OTHER SURFACES  
F.....RAINFALL AMOUNT OF THE STORM EVENT SAMPLED; IF TWO OR MORE EVENTS WERE SAMPLED, REPORT THE HIGHER OR HIGHEST AMOUNT.

OUTFALL NO.        A        ☐ SQ FEET ☐ ACRES

B        % C        % D        % E        % F        INCHES

PARAMETER	QUALITY OR CONCENTRATION			REPORT LEVEL	UNITS	NO. OF SAMPLES	SAMPLE TYPE
	MINIMUM	AVERAGE	MAXIMUM				
BOD, 5-DAY (00310)				50	mg/l		COMP.
TOTAL S. SOLIDS (00530)				200	mg/l		COMP.
NITROGEN, AMMONIA (00610)				4	mg/l		COMP.
OIL AND GREASE (00550)				15	mg/l		GRAB
pH (00400)				4.0 - 9.0	stand.		GRAB

HAS A STORM WATER POLLUTION PREVENTION PLAN BEEN PREPARED FOR THIS FACILITY? ☒ YES ☐ NO

HAS THE PLAN BEEN SIGNED BY A PERSON WHO MEETS THE SIGNATORY REQUIREMENTS OF THE PERMIT? ☒ YES ☐ NO

HAS THE PLAN BEEN IMPLEMENTED? ☒ YES ☐ NO

HAVE YOUR STORM WATER OUTFALLS BEEN TESTED FOR UNPERMITTED, NON-STORM WATER DISCHARGES? ☐ YES ☒ NO

ARE THERE ANY UNPERMITTED, NON-STORM WATER DISCHARGES PRESENT? ☐ YES ☒ NO

IF SO, ATTACH RESULTS OF YOUR INVESTIGATION.

I CERTIFY UNDER PENALTY OF LAW THAT I HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITTED HEREIN; AND BASED ON MY INQUIRY OF THOSE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION, I BELIEVE THE SUBMITTED INFORMATION IS TRUE, ACCURATE AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT.

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER

JOE WARREN V/P MANUFACTURING

TYPED OR PRINTED

SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT

DATE

10 29 93

YEAR MONTH DAY





TENNESSEE DEPARTMENT OF ENVIRONMENT AND CONSERVATION  
STORM WATER MONITORING REPORT  
MONITORING YEAR 11/01/94 TO 11/01/95

PAGE 1 OF 3

FACILITY NAME A S Hospitality  
ADDRESS 3493 Lamar  
CITY Memphis COUNTY Shelby

NPDES PERMIT NUMBER TNR00 0107  
CONTACT PERSON Joe Warren/Gary Martin  
PHONE NUMBER (901) 365-4742

TOTAL NUMBER OF FACILITY OUTFALLS THAT CONVEY "STORM  
WATER DISCHARGES ASSOCIATED WITH INDUSTRIAL ACTIVITY" :

-3-

TOTAL NUMBER OF ABOVE OUTFALLS SAMPLED DURING THE MONITORING YEAR :

-3-

TOTAL NUMBER OF STORM EVENTS SAMPLED :

-1-

**Note: Read instructions on back  
before completing this form.**

PROVIDE THE FOLLOWING INFORMATION FOR EACH OUTFALL SAMPLED THIS YEAR:

A.....DRAINAGE AREA OF OUTFALL

B.....PERCENTAGE OF DRAINAGE AREA DEFINED AS INDUSTRIAL ACTIVITY

C.....PERCENTAGE OF DRAINAGE AREA ON YOUR PROPERTY CONSISTING OF IMPERVIOUS SURFACES (CONCRETE, PAVEMENT, ROOF, PONDS)

D.....PERCENTAGE OF DRAINAGE AREA ON YOUR PROPERTY CONSISTING OF VEGETATION (FOREST, LAWN, FIELD)

E.....PERCENTAGE OF DRAINAGE AREA CONSISTING OF GRAVEL OR OTHER SURFACES

F.....RAINFALL AMOUNT OF THE STORM EVENT SAMPLED; IF TWO OR MORE EVENTS WERE SAMPLED, REPORT THE HIGHER OR HIGHEST AMOUNT.

OUTFALL NO. S, O, 1 A 27,216 ☒ SQ FEET ☐ ACRES  
B 100 % C 100 % D 0 % E 0 % F 0.1 INCHES

PARAMETER	QUALITY OR CONCENTRATION			REPORT LEVEL	UNITS	NO. OF SAMPLES	SAMPLE TYPE
	MINIMUM	AVERAGE	MAXIMUM				
BOD, 5-DAY (00310)	55			50	mg/l		COMP.
TOTAL S&SOLIDS (00530)	33			200	mg/l		COMP.
NITROGEN, AMMONIA (00610)	1.03			4	mg/l		COMP.
OIL AND GREASE (00550)	< 5			15	mg/l		GRAB
pH (00400)	8.5			4.0 - 9.0	stand.		GRAB

HAS A STORM WATER POLLUTION PREVENTION PLAN BEEN PREPARED FOR THIS FACILITY? ☒ YES ☐ NO

HAS THE PLAN BEEN SIGNED BY A PERSON WHO MEETS THE SIGNATORY REQUIREMENTS OF THE PERMIT? ☒ YES ☐ NO


HAS THE PLAN BEEN IMPLEMENTED? ☒ YES ☐ NO

HAVE YOUR STORM WATER OUTFALLS BEEN TESTED FOR UNPERMITTED, NON-STORM WATER DISCHARGES? ☒ YES ☐ NO

ARE THERE ANY UNPERMITTED, NON-STORM WATER DISCHARGES PRESENT? ☐ YES ☒ NO

IF SO, ATTACH RESULTS OF YOUR INVESTIGATION.

I CERTIFY UNDER PENALTY OF LAW THAT I HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITTED HEREIN; AND BASED ON MY INQUIRY OF THOSE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION, I BELIEVE THE SUBMITTED INFORMATION IS TRUE, ACCURATE AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT.

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER JOE WARREN V/P of MANUFACTURING		DATE 95 7 17
TYPED OR PRINTED	SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT	YEAR MONTH DAY





TENNESSEE DEPARTMENT OF ENVIRONMENT AND CONSERVATION  
STORM WATER MONITORING REPORT  
MONITORING YEAR 11/01/94 TO 11/01/95

PAGE 2 OF 3

FACILITY NAME A S Hospitality  
ADDRESS 3493 Lamar  
CITY Memphis COUNTY Shelby

NPDES PERMIT NUMBER TNR00 0107  
CONTACT PERSON Joe Warren/Gary Martin  
PHONE NUMBER (901) 365-4742

TOTAL NUMBER OF FACILITY OUTFALLS THAT CONVEY "STORM  
WATER DISCHARGES ASSOCIATED WITH INDUSTRIAL ACTIVITY":

TOTAL NUMBER OF ABOVE OUTFALLS SAMPLED DURING THE MONITORING YEAR :

TOTAL NUMBER OF STORM EVENTS SAMPLED :

-3-  
-3-  
-1-

**Note: Read instructions on back  
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- A.....DRAINAGE AREA OF OUTFALL  
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E.....PERCENTAGE OF DRAINAGE AREA CONSISTING OF GRAVEL OR OTHER SURFACES  
F.....RAINFALL AMOUNT OF THE STORM EVENT SAMPLED; IF TWO OR MORE EVENTS WERE SAMPLED, REPORT THE HIGHER OR HIGHEST AMOUNT.

OUTFALL NO. S.O. 2 A 46,728 ☒ SQ FEET ☐ ACRES  
B 0 % C 100 % D 0 % E 0 % F 0.1 INCHES

PARAMETER	QUALITY OR CONCENTRATION			REPORT LEVEL	UNITS	NO. OF SAMPLES	SAMPLE TYPE
	MINIMUM	AVERAGE	MAXIMUM				
BOD, 5-DAY (00310)	12			50	mg/l		COMP.
TOTAL S&SOLIDS (00530)	< 2			200	mg/l		COMP.
NITROGEN, AMMONIA (00610)	0.9			4	mg/l		COMP.
OIL AND GREASE (00550)	<5			15	mg/l		GRAB
pH (00400)	7.4			4.0 - 9.0	stand.		GRAB

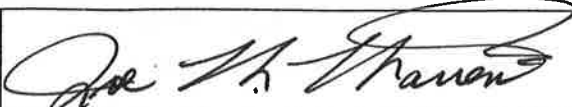
HAS A STORM WATER POLLUTION PREVENTION PLAN BEEN PREPARED FOR THIS FACILITY? ☒ YES ☐ NO

HAS THE PLAN BEEN SIGNED BY A PERSON WHO MEETS THE SIGNATORY REQUIREMENTS OF THE PERMIT? ☒ YES ☐ NO

HAS THE PLAN BEEN IMPLEMENTED? ☒ YES ☐ NO

HAVE YOUR STORM WATER OUTFALLS BEEN TESTED FOR UNPERMITTED, NON-STORM WATER DISCHARGES? ☒ YES ☐ NO

ARE THERE ANY UNPERMITTED, NON-STORM WATER DISCHARGES PRESENT? ☐ YES ☒ NO  
IF SO, ATTACH RESULTS OF YOUR INVESTIGATION.

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NAME/TITLE PRINCIPAL EXECUTIVE OFFICER Joe Warren V/P of Manufacturing		DATE 95 7 17
TYPED OR PRINTED	SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT	YEAR MONTH DAY



TENNESSEE DEPARTMENT OF ENVIRONMENT AND CONSERVATION  
STORM WATER MONITORING REPORT  
MONITORING YEAR 11/01/94 TO 11/01/95

PAGE 3 OF 3

FACILITY NAME A S Hospitality  
ADDRESS 3493 Lamar  
CITY Memphis COUNTY Shelby

NPDES PERMIT NUMBER TNR00-0107  
CONTACT PERSON Joe Warren/Gary Martin  
PHONE NUMBER (901) 365-4742

TOTAL NUMBER OF FACILITY OUTFALLS THAT CONVEY "STORM  
WATER DISCHARGES ASSOCIATED WITH INDUSTRIAL ACTIVITY":

-3-

TOTAL NUMBER OF ABOVE OUTFALLS SAMPLED DURING THE MONITORING YEAR:

-3-

TOTAL NUMBER OF STORM EVENTS SAMPLED:

-1-

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D.....PERCENTAGE OF DRAINAGE AREA ON YOUR PROPERTY CONSISTING OF VEGETATION (FOREST, LAWN, FIELD)  
E.....PERCENTAGE OF DRAINAGE AREA CONSISTING OF GRAVEL OR OTHER SURFACES  
F.....RAINFALL AMOUNT OF THE STORM EVENT SAMPLED; IF TWO OR MORE EVENTS WERE SAMPLED, REPORT THE HIGHER OR HIGHEST AMOUNT.

OUTFALL NO. S, 0, 3 A 28,080 ☒ SQ FEET ☐ ACRES  
B 100 % C 100 % D 0 % E 0 % F 0.1 INCHES

PARAMETER	QUALITY OR CONCENTRATION			REPORT LEVEL	UNITS	NO. OF SAMPLES	SAMPLE TYPE
	MINIMUM	AVERAGE	MAXIMUM				
BOD, 5-DAY (00310)	18			50	mg/l		COMP.
TOTAL S&S SOLIDS (00530)	<2			200	mg/l		COMP.
NITROGEN, AMMONIA (00610)	0.564			4	mg/l		COMP.
OIL AND GREASE (00550)	<5			15	mg/l		GRAB
pH (00400)	7.3			4.0 - 9.0	stand.		GRAB

HAS A STORM WATER POLLUTION PREVENTION PLAN BEEN PREPARED FOR THIS FACILITY? ☒ YES ☐ NO

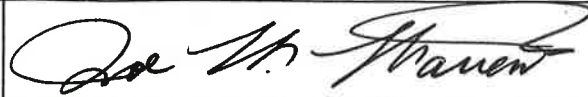
HAS THE PLAN BEEN SIGNED BY A PERSON WHO MEETS THE SIGNATORY REQUIREMENTS OF THE PERMIT? ☒ YES ☐ NO

HAS THE PLAN BEEN IMPLEMENTED? ☒ YES ☐ NO

HAVE YOUR STORM WATER OUTFALLS BEEN TESTED FOR UNPERMITTED, NON-STORM WATER DISCHARGES? ☒ YES ☐ NO

ARE THERE ANY UNPERMITTED, NON-STORM WATER DISCHARGES PRESENT? ☐ YES ☒ NO  
IF SO, ATTACH RESULTS OF YOUR INVESTIGATION.

I CERTIFY UNDER PENALTY OF LAW THAT I HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITTED HEREIN; AND BASED ON MY INQUIRY OF THOSE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION, I BELIEVE THE SUBMITTED INFORMATION IS TRUE, ACCURATE AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT.

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER JOE WARREN V/P of MANUFACTURING		DATE		
TYPED OR PRINTED		95	7	17
	SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT	YEAR	MONTH	DAY

ENVIRONMENTAL TESTING & CONSULTING, INC.  
2924 Walnut Grove Road - Memphis, TN 38111 - (901)327-2750  
INORGANIC ANALYSIS DATA SHEET

Client Name **AS Hospitality**

Project #

**3493 Lamar Avenue  
Memphis, TN 38118**

Site ID **Stormwater**

Date Arrived **05/15/95**  
ETC Order Number **9505403**

ETC Lab ID **9505403-01**  
Sample ID: **#1 Grab/Front Dock**

Matrix : **AQUEOUS**  
Sample Date : **05/15/95**

TEST	RESULT	UNITS	DETECTION LIMIT	TIME ANALYZED	DATE ANALYZED BY	METHOD
Oil and Grease	<5	mg/L	5	0830	05/24/95 AE	413.1
pH	8.5	SU		1515	05/15/95 SH	150.1

ETC Lab ID **9505403-02**  
Sample ID: **#1 Composite/Front Dock**

Matrix : **AQUEOUS**  
Sample Date : **05/15/95**

TEST	RESULT	UNITS	DETECTION LIMIT	TIME ANALYZED	DATE ANALYZED BY	METHOD
Biochemical Oxygen Demand	55	mg/L	5	1340	05/15/95 GD	405.1
Ammonia - Nitrogen	1.03	mg/L	0.100	1330	05/23/95 GD	350.3
pH	7.4	SU		1515	05/15/95 SH	150.1
Total Suspended Solids	33	mg/L	2	1400	05/19/95 AE	160.2

ETC Lab ID **9505403-03**  
Sample ID: **#2 Grab/Employee Parking**

Matrix : **AQUEOUS**  
Sample Date : **05/15/95**

TEST	RESULT	UNITS	DETECTION LIMIT	TIME ANALYZED	DATE ANALYZED BY	METHOD
Oil and Grease	<5	mg/L	5	0830	05/24/95 AE	413.1
pH	7.4	SU		1515	05/15/95 SH	150.1

  
LABORATORY MANAGER

**ENVIRONMENTAL TESTING & CONSULTING, INC.**  
2924 Walnut Grove Road - Memphis, TN 38111 - (901)327-2750  
**INORGANIC ANALYSIS DATA SHEET**

Client Name **AS Hospitality**

Project #

**3493 Lamar Avenue  
Memphis, TN 38118**

Site ID **Stormwater**

Date Arrived 05/15/95  
ETC Order Number 9505403  
ETC Lab ID 9505403-04

Matrix :AQUEOUS  
Sample Date :05/15/95

**Sample ID: #2 Composite/Empl. Parking**

TEST	RESULT	UNITS	DETECTION LIMIT	TIME ANALYZED	DATE ANALYZED BY	METHOD
Biochemical Oxygen Demand	12	mg/L	5	1340	05/15/95 GD	405.1
Ammonia - Nitrogen	0.900	mg/L	0.100	1330	05/23/95 GD	350.3
pH	7.3	SU		1515	05/15/95 SH	150.1
Total Suspended Solids	<2	mg/L	2	1400	05/19/95 AE	160.2

ETC Lab ID 9505403-05  
**Sample ID: #3 Grab/Back Dock**

Matrix :AQUEOUS  
Sample Date :05/15/95

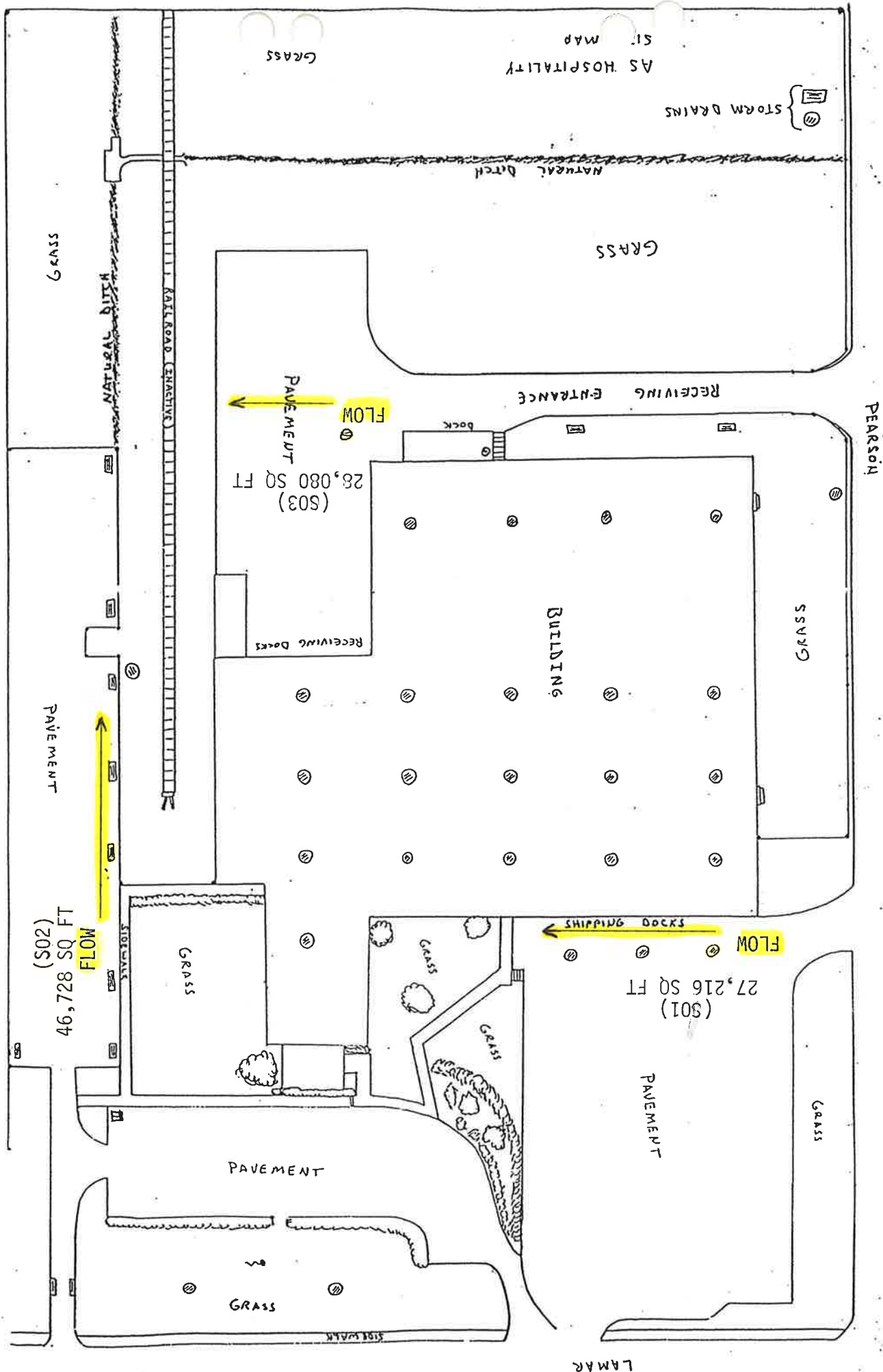
TEST	RESULT	UNITS	DETECTION LIMIT	TIME ANALYZED	DATE ANALYZED BY	METHOD
Oil and Grease	<5	mg/L	5	1600	05/24/95 AE	413.1
pH	7.3	SU		1515	05/15/95 SH	150.1

ETC Lab ID 9505403-06  
**Sample ID: #3 Composite/Back Dock**

Matrix :AQUEOUS  
Sample Date :05/15/95

TEST	RESULT	UNITS	DETECTION LIMIT	TIME ANALYZED	DATE ANALYZED BY	METHOD
Biochemical Oxygen Demand	18	mg/L	5	1340	05/15/95 GD	405.1
Ammonia - Nitrogen	0.564	mg/L	0.100	1330	05/23/95 GD	350.3
pH	7.3	SU		1515	05/15/95 SH	150.1
Total Suspended Solids	<2	mg/L	2	1400	05/19/95 AE	160.2

  
LABORATORY MANAGER



LAMAR

PEARSON

AS HOSPITALITY

SIT MAP

STORM DRAINS

NATURAL DITCH

GRASS

RECEIVING ENTRANCE

FLOW

PAVEMENT

28,080 SQ FT  
(S03)

RECEIVING DOCKS

BUILDING

GRASS

PAVEMENT

FLOW

46,728 SQ FT  
(S02)

GRASS

PAVEMENT

GRASS

SIDE WALK

27,216 SQ FT  
(S01)

PAVEMENT

GRASS

SHIPPING DOCKS

FLOW

GRASS

GRASS



A S Hospitality 3493 Lamar Ave.  
Memphis, TN 38118 (901) 365-4742

STATE of TENNESSEE  
DEPARTMENT OF ENVIRONMENT AND CONSERVATION  
MEMPHIS ENVIRONMENTAL FIELD OFFICE  
SUITE E-645, PERIMETER PARK  
2510 MT. MORIAH  
MEMPHIS, TN 38115-1520  
EDDY K. BOUZEID

Mr. Bouzeid:

Enclosed please find one (1) each of the '94/'95 Storm Water Monitoring Reports for each of the three (3) outfalls required to be tested. Also include are the test results for the three (3) samples taken.

Outfall S01 shows slight above-level for Biochemical Oxygen Demand (BOD). The source of this above-level is not known, for inspection of the area disclosed nothing out of the ordinary. If the above-levels persist, then A S Hospitality will contact your office for assistance in locating and eliminating same.

During the 05 July '95 visit, you indicated that something in writing from A S Hospitality was needed for your file, concerning the waiver of the '93 Storm Water Monitoring Report. Mr. Warren has indicated that this waiver came from Mr. John Leonard of your office. It is hoped that this will suffice for this requirement.

I can be contacted at (901) 365-4742, M-F from 0800 -1700 CST.

Sincerely

Gary Martin  
Assistant Purchasing Manager  
A S Hospitality





**COPY**

STATE OF TENNESSEE  
DEPARTMENT OF ENVIRONMENT AND CONSERVATION  
401 CHURCH STREET  
L & C ANNEX 6TH FLOOR  
NASHVILLE TN 37243-1534

April 23, 2004

Mr. Alan Hare  
A.S. Hospitality  
3493 Lamar Ave  
Memphis, TN 38118

APR 10 2004

Subject: **Tennessee Multi-Sector General NPDES Storm Water Permit (TMSP)**  
**Tracking Number TNR050107**  
**Conditional No Exposure Exclusion for Industrial Activity**  
**A.S. Hospitality, Memphis, Shelby County, Tennessee**

Dear Mr. Hare:

The Division of Water Pollution Control acknowledges receipt of a No Exposure Certification Form on . This form was submitted by you according to Section 122.26(g) of the EPA Storm Water Phase II Rule, which requires industrial operators claiming no exposure to submit written certification that a condition of no exposure exists at their facility/site. A condition of no exposure means that material handling equipment or activities, raw materials, intermediate or final products, waste materials, by-products or industrial machinery are **not** exposed to storm water.

Our review of this facility's permit file, compliance records and the above referenced form indicates that an exclusion from NPDES storm water permitting under the TMSP is acceptable. Please note that you must resubmit a no exposure certification at least once every 5 years. We would like to point out that by submitting the No Exposure Certification Form, you certified under penalty of law that there are no discharges of storm water contaminated by exposure to industrial activities or materials from the industrial facility or site identified in this document (except as allowed under 40 CFR 122.26(g)(2)). If the condition of no exposure ceases, then you must immediately obtain coverage under a storm water NPDES permit by submitting a completed NOI form. Please note that the NPDES permitting authority (or MS4 operator where the discharge is into the local MS4) must be allowed to perform inspections to confirm the condition of no exposure and to make such inspection reports publicly available upon request.

If you have questions, please contact the Division of Water Pollution Control at your local Environmental Assistance Center at 1-888-891-TDEC; or, at this office, please contact Mr. Jim McAdoo at (615) 532-0684 or by E-mail at [Jim.McAdoo@state.tn.us](mailto:Jim.McAdoo@state.tn.us).

Sincerely,

Saya Ann Qualls, P.E.  
Manager, Permit Section  
Division of Water Pollution Control



**ENVIRONMENTAL ASSISTANCE CENTER  
TENNESSEE DEPARTMENT OF ENVIRONMENT AND CONSERVATION  
SUITE E-645, PERIMETER PARK  
2510 MT. MORIAH ROAD  
MEMPHIS, TENNESSEE 38115-1520  
PHONE (901) 368-7939 STATEWIDE 1-888-891-8332 FAX (901) 368-7979**

April 2, 2004

Mr. Greg Thomas  
A.S. Hospitality  
3493 Lamar Avenue  
Memphis, TN 38118

Re: Compliance Evaluation Inspection  
A.S. Hospitality  
TMSP Permit No. TNR050107  
Shelby County

Dear Mr. Thomas:

On Wednesday, March 24, 2004, I conducted a Compliance Evaluation Inspection (CEI) at the A.S. Hospitality facility located in Memphis, Tennessee. Upon arrival at the facility, I met with you and stated that the purpose of my inspection was to evaluate the company's compliance with its Tennessee Multi-Sector Storm Water Permit (TMSP). This was accomplished by reviewing your self-monitoring records and reports and conducting a walk-through inspection of the plant site.

Attached you will find a copy of the EPA Water Compliance Inspection Report, which summarizes the findings of my inspection. The overall score is 2.0, which is unsatisfactory.

There are some areas that appeared to be in need of immediate correction and/or continuing attention:

- (1) Documentation of the quarterly visual inspections for storm water was not on file as required by the TMSP. As noted in Part XII of this report, a copy of an inspection checklist generated by the Division was given to you.

- (2) A Storm Water Pollution Prevention Plan (SWPPP) written in November 2003 was on file. However, the plan needs to be updated to reflect the changes that have occurred at the facility (see part XIV of this report).

Although the facility's standard industrial classification (SIC) code falls under sector X of the TMSP, the site inspection revealed that there are no industrial activities or materials stored outside and exposed to storm water runoff. Therefore, A.S. Hospitality may request a No Exposure Certification. Once approved, TMSP coverage will be terminated, and a new tracking number will be issued for coverage under the No Exposure Certification. Information about the No Exposure Certification form is available on our website: [www.state.tn.us/environment/permits/strmh2o.htm](http://www.state.tn.us/environment/permits/strmh2o.htm).

I certainly appreciate your cooperation during the inspection. In the meantime, if you have any questions or comments, please call me at 368-7997.

Sincerely,

*Maylynne Pynkala*

Maylynne Pynkala  
Environmental Protection Specialist  
Division of Water Pollution Control

C: Terry Templeton, Manager, DWPC\MEAC  
Chris Moran, Enforcement & Compliance, Nashville  
File



## Water Compliance Inspection Report

### Section A: National Data Coding (i.e., PCS)

Transaction	Code	NPDES #	yr / mo / dy	Inspection Type	Inspector	Facility Type
N	5	T N R 0 5 0 1 0 7	0 4 0 3 2 4	R	S	2

Remarks

Inspection Work Days	Facility Self - Monitoring Rating	BI	QA	Reserved
	2	N	N	

### Section B: Facility Data

Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number) A.S. Hospitality  3493 Lamar Avenue Memphis, TN 38118	Entry Time 2:00pm	Permit Effective Date March 1, 2002
	Exit Time 3:00pm	Permit Expiration Date December 31, 2006
Name(s) of Onsite Representative(s) / Title(s) / Phone and Fax Number(s) Mr. Greg Thomas Maintenance Supervisor (901) 365-4742	Other Facility Data	
Name, Address of Responsible Official / Title / Phone and Fax Number Same As Above		
Contacted <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		

### Section C: Areas Evaluated During Inspection (Check only those areas evaluated)

<input checked="" type="checkbox"/> Permit	<input type="checkbox"/> Flow Measurement	<input type="checkbox"/> Operation & Maintenance	<input type="checkbox"/> CSO / SSO (Sewer Overflow)
<input checked="" type="checkbox"/> Records / Reports	<input checked="" type="checkbox"/> Self-monitoring Program	<input type="checkbox"/> Sludge Handling	<input checked="" type="checkbox"/> Pollution Prevention
<input checked="" type="checkbox"/> Facility Site Review	<input type="checkbox"/> Compliance Schedule	<input type="checkbox"/> Pretreatment Program	<input type="checkbox"/> Multimedia
<input type="checkbox"/> Effluent / Receiving Waters	<input checked="" type="checkbox"/> Laboratory	<input checked="" type="checkbox"/> Storm Water	<input type="checkbox"/> Other: Sign

### Section D: Summary of Findings / Comments

(See attached sheets for narrative)

Name (s) and Signature(s) of Inspector(s) Maylynne Pynkala 	Agency / Office / Phone and Fax Numbers TDEC / DWPC / MEAC 901-368-7997 / (FAX) 901-368-7979	Date 4/2/04
Name (s) and Signature(s) of Reviewer(s) Eddy Bouzeid 	Agency / Office / Phone and Fax Numbers TDEC / DWPC / MEAC 901-368-7964 / (FAX) 901-368-7979	Date 4/2/04
Signature of Management Q A Reviewer Terry R. Templeton 	TDEC / DWPC / MEAC 901-368-7959 / (FAX) 901-368-7979	Date 4/2/04

**EPA**

## Water Compliance Inspection Report (Continued)

### **Section D: Summary of Findings / Comments**

On March 24, 2004, Maylynne Pynkala conducted a Compliance Evaluation Inspection (CEI) at the A.S. Hospitality facility located in Memphis, Tennessee. I met with Mr. Greg Thomas (maintenance supervisor), and reviewed their monitoring records and discussed their self-monitoring program. Afterwards, Mr. Thomas and I toured the facility. The following is a summary of my findings and observations.

#### **I. Permit (*Satisfactory*)**

A.S. Hospitality is covered under the Tennessee Multi-Sector Storm Water Permit (TMSP) tracking number TNR050107. The TMSP authorizes the facility to discharge storm water associated with industrial activity.

The facility falls under sector X (printing and plate making facilities, Standard Industrial Classification (SIC) code 2732), of the TMSP. According to this sector, no sampling is required.

#### **II. Records / Reports (*Unsatisfactory*)**

A copy of the TMSP was on file for review.

Documentation of the quarterly visual inspection reports for storm water was not on file as required by the TMSP.

#### **III. Facility Site Review (*Satisfactory*)**

Printing operations at the A.S. Hospitality facility are conducted indoors, and the facility does not have any materials stored outside exposed to storm water runoff.

#### **IV. Effluent / Receiving Waters (*Not Applicable*)**

#### **V. Flow Measurement (*Not Applicable*)**

#### **VI. Self Monitoring Program (*Unsatisfactory*)**

As mentioned in Part II of this report, quarterly visual inspections have not been conducted.

**VII. Compliance Schedule (*Not Applicable*)**

**VIII. Laboratory (*Satisfactory*)**

As mentioned in Part I of this report, no sampling is required.

**IX. Operation & Maintenance (*Not Applicable*)**

**X. Sludge Handling (*Not Applicable*)**

**XI. Pretreatment Program (*Not Applicable*)**

**XII. Storm Water (*Unsatisfactory*)**

As mentioned in Part II of this report, the permittee has not conducted the quarterly storm water observations as required by the TMSP. The Division of Water Pollution Control requires that the facility have a thorough outfall inspection checklist for its storm water outfall as mandated by the permit. During the site visit, the following were given to Mr. Thomas for his records: (1) a copy of an outfall inspection checklist form generated by the Division, (2) permit requirements covered under Sector X of the TMSP, and (3) a copy of a guidance summary for developing a storm water pollution prevention plan.

**XIII. CSO / SSO (Sewer Overflow) (*Not Applicable*)**

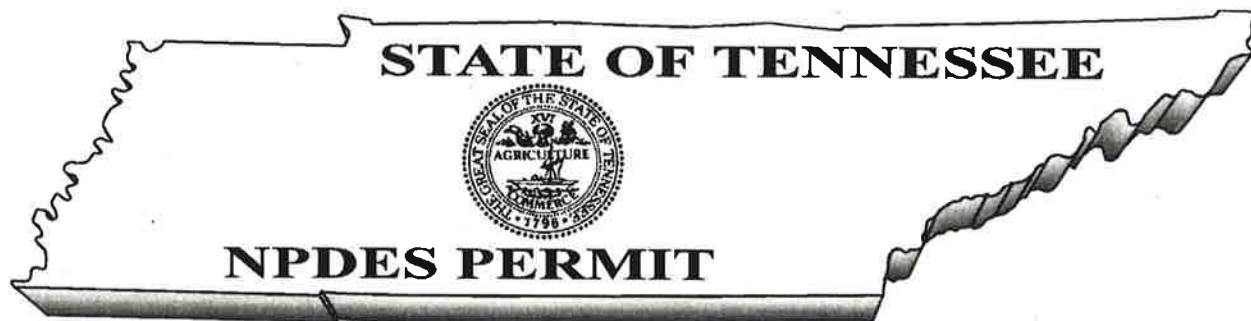
**XIV. Pollution Prevention (*Unsatisfactory*)**

A Storm Water Pollution Prevention Plan (SWPPP) written in 1993 was on file. However, the plan needs to be updated at least every three years or whenever any changes occur at the facility. Mr. Thomas stated that the plan would be updated, and he would follow the guidelines from the guidance summary for developing a storm water pollution prevention plan.

**XV. Multi-Media (*Not Applicable*)**

**XVI. Other: Sign (*Not Applicable*)**





**Tracking Number: TNR050107**

**General NPDES Permit for  
STORM WATER DISCHARGES ASSOCIATED WITH  
INDUSTRIAL ACTIVITY (TMSP)**

Effective March 1, 2002, through December 31, 2006

Tennessee Department of Environment and Conservation  
Division of Water Pollution Control  
401 Church Street  
6th Floor, L and C Annex  
Nashville, Tennessee 37243-1534

Under authority of the Tennessee Water Quality Control Act of 1977 (T.C.A. 69-3-101 et seq.) and the delegation of authority from the United State Environmental Protection Agency under the Federal Water Pollution Control Act, as amended by the Clean Water Act of 1977 (33 U.S.C. 1251, et seq.):

Discharger(s): **A.S. Hospitality**

Is authorized to discharge: **storm water associated with industrial activities**

from a facility located at: **3493 Lamar Ave**

in the city of: **Memphis**

in the county: **Shelby**

to receiving waters named: **Nonconnah Creek**


in accordance with effluent limitations, monitoring requirements and other conditions set forth herein

Coverage under this general permit shall become effective on: **March 01, 2002**

and shall expire on: **December 31, 2006**

Issuance date: **February 12, 2002**

Sector(s): **X**

  
\_\_\_\_\_  
Paul E. Davis, Director  
Division of Water Pollution Control



No. TNR05 0107

General NPDES Permit for  
**STORM WATER DISCHARGES ASSOCIATED WITH  
INDUSTRIAL ACTIVITY**

Effective March 1, 1997, through December 31, 2001

Tennessee Department of Environment and Conservation  
Division of Water Pollution Control  
401 Church Street  
6th Floor, L&C Annex  
Nashville, Tennessee 37243-1534

Under authority of the Tennessee Water Quality Control Act of 1977 (T.C.A. 69-3-101 et seq.) and the delegation of authority from the United States Environmental Protection Agency under the Federal Water Pollution Control Act, as amended by the Clean Water Act of 1977 (33 U.S.C. 1251, et seq.):

Discharger: A.S. HOSPITALITY

is authorized to discharge: storm water associated with industrial activity

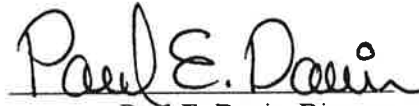
from a facility located: AT 3493 LAMAR AVE IN SHELBY COUNTY

to receiving waters named: NONCONNAH CREEK

in accordance with effluent limitations, monitoring requirements and other conditions set forth herein.

Coverage under this general permit shall become effective on July 02, 1997 and shall expire on December 31, 2001.

Notice of Coverage Issuance date: August 07, 1997

  
Paul E. Davis, Director  
Division of Water Pollution Control

Enclosed Industry Sectors: X



**STATE OF TENNESSEE  
DEPARTMENT OF ENVIRONMENT AND CONSERVATION  
MEMPHIS ENVIRONMENTAL FIELD OFFICE  
SUITE E-645, PERIMETER PARK  
2510 MT. MORIAH  
MEMPHIS, TENNESSEE 38115-1520**

July 05, 1995

Gary Martin  
A.S. Hospitality  
3493 Lamar Ave  
Memphis, TN 38118

RE: Compliance Evaluation Inspection  
Permit Numbers TNR00107  
Shelby County

Dear Mr. Martin

On July 05, 1995, I conducted a Compliance Evaluation Inspection (CEI) of the stormwater discharges, the records and the Stormwater Pollution Prevention Plan (SWPPP) for the above referenced facilities in Shelby County. For your compliance the following observations and recommendations are made based on the findings of the inspection:

1. Stormwater sampling have not been conducted for 1994. A SWPPP for the above facility has been generated and the plan was onsite. Please submit a copy of the facility's detailed map to the Memphis Basin Office (MBO).
2. Stormwater sampling for 1995 has been conducted. Please submit a copy of the 1995 stormwater monitoring data when available.
3. As requested, enclosed you will find the stormwater regulations for your file.

Gary Martin  
July 05, 1995  
Page 2

If you have any questions concerning this matter, please contact me at (901)368-7989.

Sincerely

A handwritten signature in black ink, appearing to read "Eddy Bouzeid", with a stylized flourish at the end.

Eddy Bouzeid  
Division of Water Pollution

cc: John Leonard, Manager Memphis Field Office  
Marguarite Smith, Enforcement And Compliance, Nashville



State of Tennessee  
Department of Environment & Conservation  
Division of Water Pollution Control

RECEIVED  
OCT 19 1992

NOTICE OF INTENT  
for  
Baseline General Permit to Discharge  
Storm Water Associated with Industrial Activity

I. OWNER/OPERATOR

Name: <u>A.S. Hospitality</u>	A. Owner/Operator Type: (Check one)		
Mailing Address: <u>3493 Lamar Ave</u>	01. <input type="checkbox"/> Federal	02. <input type="checkbox"/> State	03. <input type="checkbox"/> City 04. <input type="checkbox"/> County
City: <u>Memphis</u>	05. <input type="checkbox"/> Management Group	06. <input checked="" type="checkbox"/> Private	99. <input type="checkbox"/> Other
Contact Person: <u>Joe Warren</u>	State: <u>TN</u>	Zip: <u>38118</u>	Phone: <u>(901) 365-4742</u>
	B. 1. <input type="checkbox"/> Owner 2. <input checked="" type="checkbox"/> Operator 3. <input type="checkbox"/> Owner/Operator		

II. FACILITY IDENTIFICATION

Facility Name: <u>A.S. Hospitality</u>	County: <u>Shelby</u>
Street Address: <u>3493 Lamar Ave</u>	Contact Person: <u>Joe Warren</u>
City: <u>Memphis</u>	State: <u>TN</u> Zip: <u>38118</u> Phone: <u>(901) 365-4742</u>

III. SITE DETAILS

Enter facility location: Latitude: <u>35</u> deg. <u>03</u> min. <u>33</u> sec. Longitude: <u>90</u> deg. <u>56</u> min. <u>24</u> sec.	Area of facility property: <u>9.85</u> <input type="checkbox"/> sq.ft. <input checked="" type="checkbox"/> acres
<input checked="" type="checkbox"/> Check box to indicate required map (8.5"x11") with facility and receiving streams highlighted and identified is attached.	Area of undeveloped land: <u>5.5</u> <input type="checkbox"/> sq.ft. <input checked="" type="checkbox"/> acres
	Area of impervious surfaces: <u>125,000</u> <input checked="" type="checkbox"/> sq.ft. <input type="checkbox"/> acres
	Area of pavement: <u>1.5</u> <input type="checkbox"/> sq.ft. <input checked="" type="checkbox"/> acres

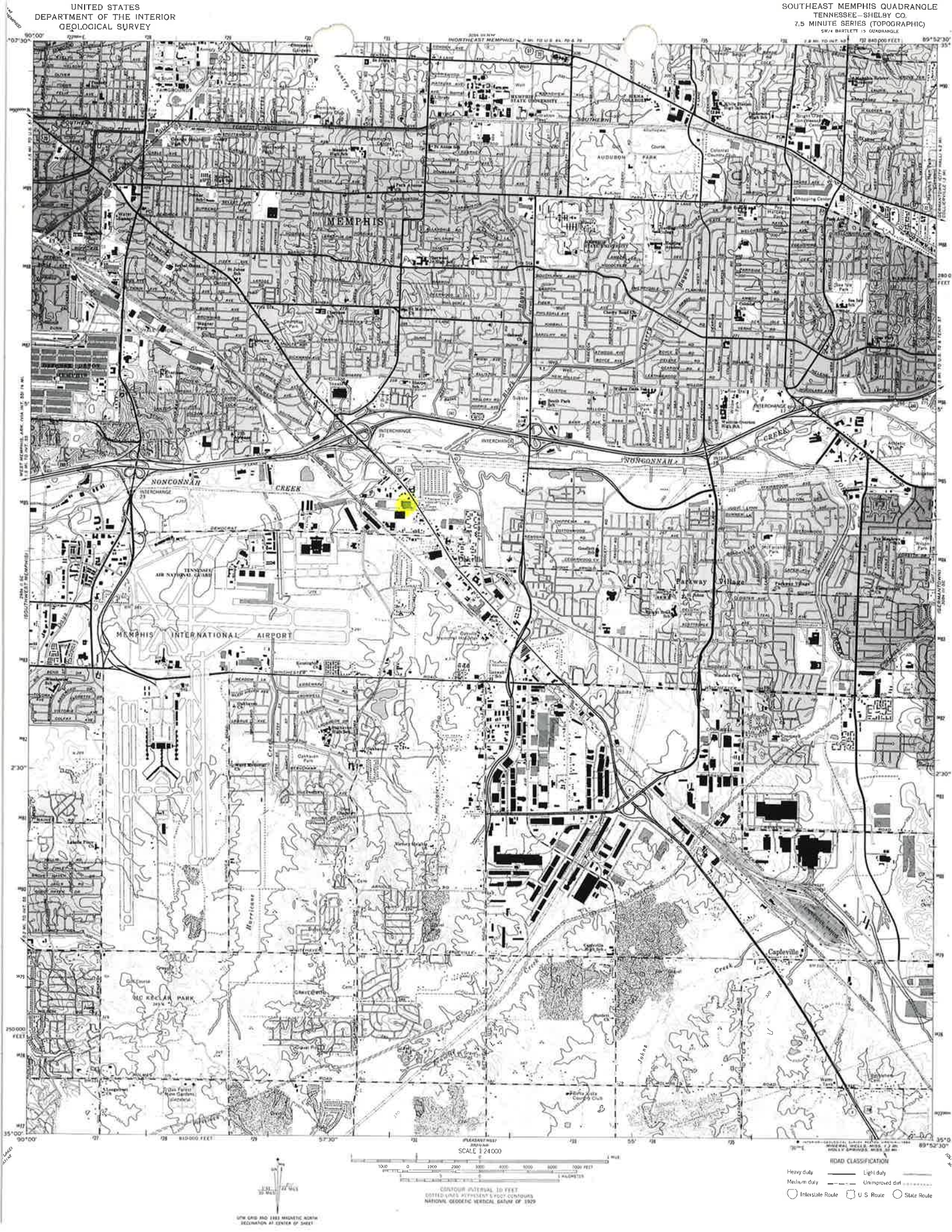
IV. INDUSTRIAL INFORMATION

A. SIC Code(s): List primary SIC code first, etc. These are 4-digit numbers. 1. <u>2700</u> 2. _____ 3. _____ 4. _____	C. Activities at facility: (Check all that apply)
B. Nature of business (keywords): <u>Printing</u>	01. <input checked="" type="checkbox"/> Manufacturing 02. <input checked="" type="checkbox"/> Storage/Distribution 03. <input checked="" type="checkbox"/> Vehicle Storage 04. <input checked="" type="checkbox"/> Trucking Terminal 05. <input type="checkbox"/> Vehicle Maintenance 06. <input type="checkbox"/> Hazardous Waste TSD 07. <input type="checkbox"/> Outside Waste Disposal 08. <input checked="" type="checkbox"/> Recycling 09. <input type="checkbox"/> Wastewater Treatment 10. <input type="checkbox"/> Land Application 11. <input type="checkbox"/> Landfill 12. <input checked="" type="checkbox"/> Solid Waste Mgt. Unit 99. <input type="checkbox"/> Other _____

STATE USE ONLY

Date NOI Received: <u>10/19/92</u>	Field Office: <u>MFO</u>	<input type="checkbox"/> Individual Permit Rationale
Date of Coverage: <u>11/03/92</u>	NPDES General Permit No.: <u>TNR00 0107</u>	Reviewer:





MEMPHIS

NONCONAH CREEK

MEMPHIS INTERNATIONAL AIRPORT

Parkway Village

Capleville

SCALE 1:24000

CONTOUR INTERVAL 10 FEET  
DOTTED LINES WITH SHORT DASHES  
NATIONAL GEODETIC VERTICAL DATUM OF 1955

ROAD CLASSIFICATION  
Heavy duty ——— Light duty ———  
Medium duty - - - - - Unimproved dirt .....  
○ Interstate Route □ U.S. Route ○ State Route

UTM GRID AND 1983 MAGNETIC NORTH  
DECLINATION AT CENTER OF SHEET