



"Partners with Industry in Preserving Our World"

July 28, 2023

Ms. Joellyn Brazile, Manager
Tennessee Department of Environment
and Conservation
Division of Water Pollution Control
8383 Wolf Lake Drive
Bartlett, Tennessee 38133-4119

RE: Cut-Off Concentration Exceedance
Annual Sampling Event Conducted in June 2023
Iskiwitz Metals
604 Marble Avenue
Memphis, Shelby County, Tennessee 38107
Permit No. TNS068276

Dear Ms. Brazile:

On behalf of Iskiwitz Metals, please find attached the Annual Stormwater Monitoring Report for the above referenced facility. The annual samples were collected in June 2023 and indicate a slight exceedance of total copper at 0.110 milligrams per liter (mg/L), which is above the Cut-Off Concentration of 0.018 mg/L. None of the other constituents of concern exceeded their respective Cut-Off values.

Currently, the facility is evaluating operational changes relating to copper containing salvage and establishing additional cover and control measures. The Stormwater Pollution Prevention Plan (SWPPP) is being updated to include these changes.

If you have any additional questions or require further information, please feel free to contact me at (901) 619-9158, or you can reach Mr. Iskiwitz at (901) 526-8944

Sincerely,
SCS Environmental Group, LLC

A handwritten signature in blue ink, appearing to read "Shawn Stewart-Pool".

Shawn Stewart-Pool, P.G. No. 3702
Senior Project Manager

Attachments



Tennessee Department of Environment and Conservation
 Division of Water Resources
 William R. Snodgrass Tennessee Tower
 312 Rosa L. Parks Avenue, 11th Floor, Nashville, Tennessee 37243

ANNUAL STORMWATER MONITORING REPORT
 for Stormwater Discharges Associated with Industrial Activity under the
TENNESSEE MULTI-SECTOR GENERAL PERMIT (TMSP)

Facility Name: Iskiwitz Metals	TMSP Number: TNR054012
Contact Person: Jamie Iskiwitz	Phone Number: 901-526-8944
This report is submitted for the following calendar year (e.g. 2015): 2023	Outfall Number: 1
List all TMSP sectors which apply to discharge from this outfall: N	Sample Date: 6/8/23
Low Concentration Waiver (Note 3): list all parameters for which the facility is certifying that there has not been a significant change in industrial activity or the pollution prevention measures in the area of the facility that drains to the outfall for which sampling was waived:	

DIRECTIONS: In the spaces below, provide the results of stormwater monitoring for the designated outfall. For each outfall, one Annual Stormwater Monitoring Report must be submitted. The parameters for which monitoring must be conducted depend on which industry sector(s) of the TMSP applies to the discharge. Look up your sector(s) in the TMSP and analyze for the parameters that apply. If parameter is not listed below, submit additional sheets. All samples should be grab.

Parameter	Cut-off Conc. (mg/L)	Annual Sample Result (mg/L)
Aluminum, Total	0.75	0.614
Ammonia	4.0	
Arsenic, Total	0.16854	
BOD, 5-Day	30	
Cadmium, Total	0.0159	
COD	120	27.8
Copper, Total	0.018	0.110
Cyanide, Total	0.064	
Fluoride	1.8	
Iron, Total	5.0	0.628
Lead, Total	0.15	

Parameter (continued)	Cut-off Conc. (mg/L)	Annual Sample Result (mg/L)
Magnesium, Total	0.0636	
Mercury, Total	0.0024	
Nickel, Total	0.875	
Nitrate + Nitrite Nitrogen	0.68	
Oil and Grease	15	
pH	5.0-9.0	
Phosphorus, Total (as P)	2.0	
Selenium, Total	0.2385	
Silver, Total	0.032	
Total Suspended Solids	150	4
Zinc, Total	0.395	0.142

CERTIFICATION AND SIGNATURE: (Make all entries in ink, not with a pencil. This report must be signed by a responsible corporate officer for a corporation, a general partner for a partnership, the proprietor for a sole proprietorship, or a principal executive officer or ranking elected official for a public agency.)

I certify under penalty of law that this document and all of its attachments were prepared under my direction or my supervision in accordance with a system designed to assure qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. As specified in Tennessee Code Annotated Section 39-16-702(a)(4), this declaration is made under penalty of perjury.

Jamie Iskiwitz <i>Jamie Iskiwitz</i>	Vice President	<i>[Signature]</i>	7/28/23
Printed Name	Official Title	Signature	Date

**Tennessee Multi-Sector General Permit (TMSP)
Annual Stormwater Monitoring Report – Instructions**

1. The purpose of this form is to report stormwater (SW) monitoring results under the TMSP. **Only 1 sample per calendar year is required** (except Sectors J and H). **For each outfall, one Annual Stormwater Monitoring Report form must be submitted.** Grab samples should be collected within the first 30 minutes (or as soon thereafter as practical, but not to exceed one hour) of when the runoff or snowmelt begins discharging. A separate form must be submitted for each outfall. If more than one pH sample is collected for any outfall, report all individual pH monitoring results for a given outfall on the corresponding form or in a separate, referenced attachment if necessary. If more than 1 sample for other parameters is collected at any outfall, submit the average results of all monitoring data (for calculating average, use the numerical method detection limit (MDL) if a parameter was not detected). If all monitoring results for a given parameter were non-detect, report the parameter as below detection limit (BDL) and provide the applicable numerical MDL value in parentheses (e.g., BDL (<0.001 mg/L)). New facilities must conduct sampling in the year during which permit coverage was obtained and during each following year. The form(s) shall be submitted 30 days after the sampling results are obtained, but no later than the March 31st of the following calendar year, whichever comes first.
2. If the results of annual SW runoff monitoring demonstrates that the facility has exceeded the cut-off concentration(s), the permittee must inform the division’s local Environmental Field Office (EFO) in writing within 30 days from the time SW monitoring results were received, describing the likely cause of the exceedance(s). Furthermore, within 60 days from the time SW monitoring results were received, the facility must review its stormwater pollution prevention plan (SWPPP), make any modifications or additions to the plan which would assist in reducing runoff concentrations to less than the monitoring cut-off concentrations for that parameter, and submit to the local EFO a summary of the proposed SWPPP modifications (including a timetable for implementation).
3. Low Concentration Waiver – When the average concentration for a pollutant calculated from monitoring data collected from 4 consecutive calendar years of monitoring is less than the cut-off concentration, a facility may waive monitoring requirements in the following annual monitoring period. This form should be used for certification of low concentration waiver provision.

Complete, sign and date this form before it is submitted. Keep a copy of the completed form for your records. The division supports and encourages submission of electronic documents (e.g., scanned reports submitted as PDF files) by using the following dedicated email address: Water.Permits@tn.gov. You may also submit the original completed and signed form to the appropriate Environmental Field Office using the addresses below.

EFO	Street Address	City	Zip	Telephone
Chattanooga	1301 Riverfront Parkway, Suite #206	Chattanooga	37402	(423) 634-5745
Columbia	1421 Hampshire Pike	Columbia	38401	(931) 380-3371
Cookeville	1221 South Willow Ave.	Cookeville	38506	(931) 432-4015
Jackson	1625 Hollywood Drive	Jackson	38305	(731) 512-1300
Johnson City	2305 Silverdale Road	Johnson City	37601	(423) 854-5400
Knoxville	3711 Middlebrook Pike	Knoxville	37921	(865) 594-6035
Memphis	8383 Wolf Lake Drive	Bartlett	38133	(901) 371-3000
Nashville	711 RS Gass Boulevard	Nashville	37216	(615) 687-7000

Mining and quarrying facilities only (Sectors J and H) should submit one signed copy of Annual Stormwater Monitoring Report to the division’s Mining Section at the following address:

**Tennessee Division of Water Resources
Mining Section
3711 Middlebrook Pike
Knoxville, TN 37921**

6/15/2023

Iskiwitz Metals
Mr. Jamie Iskiwitz
604 Marble Ave.
Memphis, TN, 38104

Ref: Analytical Testing
Lab Report Number: 23-160-0106
Client Project Description: Storm Water Sampling

Dear Mr. Jamie Iskiwitz:
Waypoint Analytical, LLC. received sample(s) on 6/9/2023 for the analyses presented in the following report.

The above referenced project has been analyzed per your instructions. The analyses were performed in accordance with the applicable analytical method. Where the laboratory was not responsible for the sampling stage (refer to the chain of custody) results apply to the sample as received.

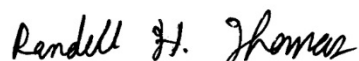
The analytical data has been validated using standard quality control measures performed as required by the analytical method. Quality Assurance, method validations, instrumentation maintenance and calibration for all parameters (NELAP and non-NELAP) were performed in accordance with guidelines established by the USEPA (including 40 CFR 136 Method Update Rule May 2021) and NELAC unless otherwise indicated. Any parameter for which the laboratory is not officially NELAP accredited is indicated by a '~' symbol. These are not included in the scope because NELAP accreditation is either not available or has not been applied for. Additional certifications may be held/are available for parameters, where NELAP accreditation is not required or applicable. A full list of certifications is available upon request.

Certain parameters (chlorine, pH, dissolved oxygen, sulfite...) are required to be analyzed within 15 minutes of sampling. Usually, but not always, any field parameter analyzed at the laboratory is outside of this holding time. Refer to sample analysis time for confirmation of holding time compliance.

The results are shown on the attached Report of Analysis(s). Results for solid matrices are reported on an as-received basis unless otherwise indicated. This report shall not be reproduced except in full and relates only to the samples included in this report.

Please do not hesitate to contact me or client services if you have any questions or need additional information.

Sincerely,



Randy Thomas
Project Manager

Laboratory's liability in any claim relating to analyses performed shall be limited to, at laboratory's option, repeating the analysis in question at laboratory's expense, or the refund of the charges paid for performance of said analysis.



Certification Summary

Laboratory ID: WP MTN: Waypoint Analytical, LLC., Memphis, TN

State	Program	Lab ID	Expiration Date
Alabama	State Program	40750	02/29/2024
Arkansas	State Program	88-0650	02/07/2024
California	State Program	2904	06/30/2023
Florida	State Program - NELAP	E871157	06/30/2023
Georgia	State Program	C044	11/14/2025
Georgia	State Program	04015	06/30/2023
Illinois	State Program - NELAP	200078	10/10/2023
Kentucky	State Program	80215	06/30/2023
Kentucky	State Program	KY90047	12/31/2023
Louisiana	State Program - NELAP	LA037	12/31/2023
Louisiana	State Program - NELAP	04015	06/30/2023
Mississippi	State Program	MS	11/14/2025
North Carolina	State Program	47701	07/31/2023
North Carolina	State Program	415	12/31/2023
Pennsylvania	State Program - NELAP	68-03195	05/31/2024
South Carolina	State Program	84002	06/30/2023
Tennessee	State Program	02027	11/14/2025
Texas	State Program - NELAP	T104704180	09/30/2023
Virginia	State Program	00106	06/30/2023
Virginia	State Program - NELAP	460181	09/14/2023



Sample Summary Table

Report Number: 23-160-0106
Client Project Description: Storm Water Sampling

Lab No	Client Sample ID	Matrix	Date Collected	Date Received
85316	Storm Water Sample	Aqueous	06/08/2023 13:00	06/09/2023

Client: Iskiwitz Metals
Project: Storm Water Sampling
Lab Report Number: 23-160-0106
Date: 6/15/2023

CASE NARRATIVE

Total Suspended Solids Method 2540D-2015

Analyte: Total Suspended Solids

QC Batch No: L687578

Relative Percent Difference (RPD) for the duplicate analysis was outside of the allowable QC limits.

27790

Iskiwitz Metals
Mr. Jamie Iskiwitz
604 Marble Ave.
Memphis , TN 38104

Project Storm Water Sampling

Information :

Report Date : 06/15/2023
Received : 06/09/2023

Randell H. Thomas

Report Number : **23-160-0106**

REPORT OF ANALYSIS

Randy Thomas
Project Manager

Lab No : **85316**

Matrix: **Aqueous**

Sample ID : **Storm Water Sample**

Sampled: **6/8/2023 13:00**

Test	Results	Units	MQL	DF	Date / Time Analyzed	By	Analytical Method
COD (Chemical Oxygen Demand)	27.8	mg/L	15.0	1	06/13/23 09:34	MJT	5220D-2011
Total Suspended Solids	4	mg/L	2	1	06/14/23 12:15	ADT	2540D-2015
Aluminum	0.614	mg/L	0.100	1	06/12/23 20:01	TJS	EPA-200.7
Copper	0.110	mg/L	0.0050	1	06/12/23 20:01	TJS	EPA-200.7
Iron	0.628	mg/L	0.100	1	06/12/23 20:01	TJS	EPA-200.7
Zinc	0.142	mg/L	0.0200	1	06/12/23 20:01	TJS	EPA-200.7

**Qualifiers/
Definitions**

DF

Dilution Factor

MQL

Method Quantitation Limit

Shipment Receipt Form

Customer Number: **27790**
 Customer Name: **Iskiwitz Metals**
 Report Number: **23-160-0106**

Shipping Method

Fed Ex US Postal Lab Other :
 UPS Client Courier Thermometer ID:

Shipping container/cooler uncompromised?	<input checked="" type="radio"/> Yes	<input type="radio"/> No	
Number of coolers/boxes received	<input type="text" value="1"/>		
Custody seals intact on shipping container/cooler?	<input type="radio"/> Yes	<input type="radio"/> No	<input checked="" type="radio"/> Not Present
Custody seals intact on sample bottles?	<input type="radio"/> Yes	<input type="radio"/> No	<input checked="" type="radio"/> Not Present
Chain of Custody (COC) present?	<input checked="" type="radio"/> Yes	<input type="radio"/> No	
COC agrees with sample label(s)?	<input checked="" type="radio"/> Yes	<input type="radio"/> No	
COC properly completed	<input checked="" type="radio"/> Yes	<input type="radio"/> No	
Samples in proper containers?	<input checked="" type="radio"/> Yes	<input type="radio"/> No	
Sample containers intact?	<input checked="" type="radio"/> Yes	<input type="radio"/> No	
Sufficient sample volume for indicated test(s)?	<input checked="" type="radio"/> Yes	<input type="radio"/> No	
All samples received within holding time?	<input checked="" type="radio"/> Yes	<input type="radio"/> No	
Cooler temperature in compliance?	<input checked="" type="radio"/> Yes	<input type="radio"/> No	
Cooler/Samples arrived at the laboratory on ice. Samples were considered acceptable as cooling process had begun.	<input checked="" type="radio"/> Yes	<input type="radio"/> No	
Water - Sample containers properly preserved	<input checked="" type="radio"/> Yes	<input type="radio"/> No	<input type="radio"/> N/A
Water - VOA vials free of headspace	<input type="radio"/> Yes	<input type="radio"/> No	<input checked="" type="radio"/> N/A
Trip Blanks received with VOAs	<input type="radio"/> Yes	<input type="radio"/> No	<input checked="" type="radio"/> N/A
Soil VOA method 5035 – compliance criteria met	<input type="radio"/> Yes	<input type="radio"/> No	<input checked="" type="radio"/> N/A
<input type="checkbox"/> High concentration container (48 hr)		<input type="checkbox"/> Low concentration EnCore samplers (48 hr)	
<input type="checkbox"/> High concentration pre-weighed (methanol -14 d)		<input type="checkbox"/> Low conc pre-weighed vials (Sod Bis -14 d)	
Special precautions or instructions included?	<input type="radio"/> Yes	<input checked="" type="radio"/> No	

Comments:

Signature:

Date & Time:

Kit ID:	207499
Initiated By:	Erin Harris
Initiated Date:	4/12/2023
Project Comment	

CHAIN-OF-CUSTOD



23-160-0106
 27790
 06-09-2023
 11:52:01

Iskiwitz Metals
 Storm Water Sampling

Company Name	Company Number	Client Project Manager/Contact	Purchase Order Number
Iskiwitz Metals	27790	Mr. Jamie Iskiwitz	
Site Name	Project Number	<input type="checkbox"/> RUSH – Additional charges apply <input type="checkbox"/> Special Detection Limits(s) Date Results Needed	Method of Shipment <input type="checkbox"/> Fed Ex <input type="checkbox"/> UPS <input type="checkbox"/> USPS <input type="checkbox"/> Courier <input type="checkbox"/> Client Drop Off Other
Storm Water Sampling			
LIMS Project ID	Project Manager Phone #	Project Manager Email	Site/Facility ID #
	901-526-8944	jbiskiwitz@gmail.com	

Date	Time	Sample ID	Matrix	Grab/Comp	# of Cont	Container Type	Preservation	Analyses
4/8/23	1:00	Storm water Sample	AQU	G	1	Plastic - Pint	NONE	TSS
6/8/23	1:00	Storm water Sample	AQU	G	1	Plastic - Pint	H2SO4 - Sulfuric Acid	COD
4/8/23	1:00	Storm water Sample	AQU	G	1	Plastic - Pint	HNO3 - Nitric Acid	Al/Cu/Fe/Zn

For Laboratory Use Only			Sampled by (Name - Print)		Client Remarks/Comments			
Ice	Custody Seals	Lab Comments	Jamie Iskiwitz					
Y/N	Y/N		Relinquished by: (SIGNATURE)	Date Time	Received by: (SIGNATURE)	Date Time		
				6/9 10:05		6/9/23 10:05		
Blank/Cooler Temp			Relinquished by: (SIGNATURE)	Date Time	Received by: (SIGNATURE)	Date Time		
1.30 1.35				6/9/23 11:20		Emily Peterson	6/9/23 11:20	