



**STATE OF TENNESSEE  
DEPARTMENT OF ENVIRONMENT AND CONSERVATION  
JACKSON ENVIRONMENTAL FIELD OFFICE  
DIVISION OF WATER RESOURCES  
1625 HOLLYWOOD DR.  
JACKSON, TN 38305-4316**

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July 3, 2024

Ms. Susan Paris  
Environmental Manager  
Teknor Apex Tennessee Company, LLC  
751 North Dupree Avenue  
Brownsville, Tennessee 38012

**RE: Compliance Evaluation Inspection  
NPDES Individual Permit Number: TN0041939  
Teknor Apex Tennessee Company, LLC  
Haywood County**

Dear Ms. Paris,

On June 20, 2024, as a representative of the Tennessee Department of Environment and Conservation, Division of Water Resources, I performed a Compliance Evaluation Inspection (CEI) at the above referenced facility in order to evaluate compliance with Individual Permit TN0041939. The division thanks you for your time and assistance. Please see the sections below for details regarding the inspection.

### **I. Permit**

National Pollutant Discharge Elimination System (NPDES) Permit TN0041939 authorizes the discharge of industrial stormwater runoff and occasional process water from Outfall 001 to unnamed tributary at mile 0.7 to Little Nixon Creek at mile 4.1 and industrial stormwater runoff and cooling tower overflow through Outfall 002 to unnamed tributary at mile 0.9 to Little Nixon Creek at mile 4.1. TN0041939 was effective on August 1, 2021 and expires on July 31, 2026.

### **II. Individual Permit and Documentation Evaluation**

The NPDES Permit TN0041939 requires that the Teknor Apex Tennessee Company, LLC to sample Outfall 001 and Outfall 002 once per discharge for BOD, pH, total suspended solids (TSS), oil and grease, phosphorus, bis phthalate, phthalate esters, flow and chlorine and submit the results monthly via NetDMR. The outfalls are also required to be sampled annually during discharges that contain process wastewater or cooling tower blowdown water. The facility is required to have a Stormwater Pollution Prevention Plan (SWPPP), conduct employee training, conduct quarterly site inspections, and conduct an annual comprehensive site evaluation.

All records were reviewed for informational accuracy and to ensure they meet the minimum permit requirements. These records are required to be retained for 3 years. No issues were observed with the documentation.

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Outfall 001 had eleven samples and Outfall 002 had five samples taken that exceeded the limit of TSS since 2021. Due to the consistent effluent exceedances of total suspended solids (TSS), Teknor Apex was issued a Director's Order for violation of the TN Water Quality Control Act in November 2023. Teknor Apex Tennessee Company, LLC has a corrective action plan in place to address the elevated TSS and follow the requirements of the Director's Order. At the time of the inspection, Teknor Apex suspects that erosion is the cause of the effluent exceedance of TSS.

### **IV. Site Inspection and Evaluation**

An inspection of the facility ground was conducted to observe the outfall locations, site conditions, and to identify any potential deficiencies that may need to be addressed. The facility has two outfalls. Outfall 001 is located in the northwest corner of the facility. During the site visit, Outfall 001 did not have the required sign. Within a week of the inspection, the sign was replaced at the outfall and photographic evidence of it being replaced was received.

Stormwater from areas that may have process wastes flows to the pretreatment area before discharging to the city. If a heavy storm event occurs, process water is allowed to be discharged from Outfall 001. Since the permit had been issued, no process water has been discharged.

Outfall 002 is located in the southwest corner of the site. At the time of the inspection, water was flowing through the outfall and appeared clear. Outfall 002 had a sign marking the location of the outfall. Cooling tower blowdown/overflow water flows from the cooling towers into a drain which flows to the outfall. These drains have a filter to prevent debris from entering.

No deficiencies were observed during the site inspection. Teknor Apex should continue to follow the Director's Order and their Corrective Action Plan to address the effluent exceedances.

### **V. Conclusion**

Compliance with TN0041939 requirements helps ensure discharges that are protective of downstream fish and aquatic life and water quality. Thank you for your efforts to ensure permit compliance and to protect state water quality. If I may be of assistance in matters concerning this report, please contact me via telephone at (731) 676-6604 or via email at [kaylee.sabo@tn.gov](mailto:kaylee.sabo@tn.gov).

Sincerely,



Kaylee Sabo, E.I.

Environmental Protection Specialist

Division of Water Resources

Jackson Environmental Field Office

e-copy:

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