



STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
KNOXVILLE ENVIRONMENTAL FIELD OFFICE
3711 MIDDLEBROOK PIKE
KNOXVILLE, TENNESSEE 37921-6538
PHONE (865) 594-6035 STATEWIDE 1-888-891-8332 FAX (865) 594-6105

October 27, 2016

Ms. Esther Jones, Vice-President, Quality
BAM, Inc.
10536 Lexington Drive
Knoxville, Tennessee 37932

RE: BAM
NPDES Permit No. TN0081523
TMSP TNR058828
Compliance Evaluation Inspection
Knox County

Dear Ms. Jones:

On October 21, 2016, Hassan Sanaat and I performed a Compliance Evaluation Inspection (CEI) at the BAM plant. Your assistance was very much appreciated, as was the help of Michelle Stewart and Alan Silverstein of BAM. Please note the following:

1. The individual NPDES permit TN0081523 covered non-contact cooling water which now is directed to the First Utility District sewer. We looked at the sewer connection and confirmed it is in place. We were told the company does not plan to keep this permit. If you would like to have this permit terminated, please submit a letter to that effect signed by a vice-president or higher. Simply allowing the permit to expire on November 30, 2016, will not automatically accomplish this because you will likely continue to receive notices and invoices and be carried in the records as having a permit until positive action is taken to terminate it.
2. Overflows from the old cooling tower have been stopped because of a change in the process where one product has been discontinued.
3. The container in the rear which was the source of leaking dark water has been removed. The dark water resulting from cleaning of filters from the boric oxide process is collected and stored in totes for hauling by the waste company Spectra.

4. The pump station for the discharge to First Utility District was opened and inspected. This hatch is currently unlocked. The utility must have access to this station. We discussed this as being a possible safety or vandalism issue, and you said that BAM would talk to the utility about locking the hatch while maintaining full access for them.
5. The plant is covered by the Tennessee Multi-Sector Stormwater Permit TNR058828, Sector AC, SIC code 3624, which requires no chemical sampling. The Stormwater Pollution Prevention Plan document needs signing, otherwise it is being implemented, with training of the stormwater team handled annually by your environmental consultant. The area in the back of the plant looked much improved since our last visit.

Thank you for your cooperation with our Division. Should you have any questions concerning this inspection or if we may be of any further assistance to you in any way, please feel free to call me at (865) 594-5521.

Sincerely,



Woodson L. Smith
Division of Water Resources

cc: Enforcement & Compliance Section, Nashville, DWR



TDEC - Division of Water Resources
Knoxville Field Office

ICIS NPDES Facilities Inspection Report

Facility Data

NPDES ID: Facility Site Name:
 Address:
 Permit Eff. Date: Permit Exp Date: SIC Code:

Compliance Monitoring Information

Compliance Monitoring Activity Name:
 * If Bio Monitoring is selected above, select the method used:
 Compliance Monitoring Activity:

Compliance Monitoring Dates/Times

Entry Date/Time (mm/dd/yyyy hh:mm): Exit Date/Time (mm/dd/yyyy hh:mm):

Facility Representatives

On-Site Representative(s) Title, Phone Number:
 Responsible Official(s), Title, Phone Number:

Statute and Section Information

Federal Statute: State Statute:
 Programs:

Compliance Monitoring Reason:
 Compliance Monitoring Agency Type: Agency Name:
 Did EPA assist/ Inspection? Time Physically conducting activity: Days: Hours:
 Inspection Type: Compliance Monitoring Action Outcome:
 Lead Agency: Compliance Monitoring Rating Code:
 If Joint Inspection, what was the purpose of the other party?

Areas Evaluated During Inspection (Check only those areas evaluated)

<input checked="" type="checkbox"/> Permit	<input type="checkbox"/> Self - Compliance Program	<input type="checkbox"/> Pretreatment
<input checked="" type="checkbox"/> Records / Records	<input type="checkbox"/> Compliance Schedule	<input type="checkbox"/> Pollution Prevention
<input type="checkbox"/> Facility Site Review	<input type="checkbox"/> Laboratory	<input checked="" type="checkbox"/> Storm Water
<input checked="" type="checkbox"/> Effluent / Receiving Waters	<input type="checkbox"/> Operations & Maintenance	<input type="checkbox"/> Combined Sewer Overflow
<input type="checkbox"/> Flow Measurement	<input type="checkbox"/> Sludge Handling / Disposal	<input type="checkbox"/> Sanitary Sewer Overflow

Compliance Monitoring Summary

EPA and State Representatives

Inspector's Signature: Agency / Office / Phone: Date:
 Manager's Signature: Agency / Office / Phone: Date:

(Note: This form can only be printed to an XPS document, then saved for later use.)



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