



STATE OF TENNESSEE  
**DEPARTMENT OF ENVIRONMENT AND CONSERVATION**  
**DIVISION OF WATER RESOURCES**

William R. Snodgrass - Tennessee Tower  
312 Rosa L. Parks Avenue, 12<sup>th</sup> Floor  
Nashville, Tennessee 37243-1102

August 17, 2015

Mr. Tom Byrd  
Purchasing Manager and Safety Director  
BAM, Inc.  
10536 Lexington Drive  
Knoxville, Tennessee 37932

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED  
7009 2820 0003 6034 6022

Subject: NOTICE OF VIOLATION  
NPDES PERMIT TN0081523  
KNOX COUNTY, TENNESSEE

Dear Mr. Byrd,

The Tennessee Division of Water Resources has reviewed the Discharge Monitoring Reports (DMRs) for BAM, Inc. (NPDES Permit TN0081523) and noted that the facility failed to operate within permit effluent limits at Outfall 001-G for pH, copper, and chlorine during the monitoring period of August 2014 through June 2015 (see enclosed table). One or more of these violations have placed you on the EPA Quarterly Noncompliance Report (QNCR).

On September 12, 2014, the Division issued a Notice of Violation (NOV) to BAM, Inc. for violations of the permit effluent limit for copper during the period of January 2014 through July 2014, leading to placement on the QNCR. On October 15, 2015, BAM, Inc., submitted a Corrective Action Plan (CAP) to eliminate the violations and expected to complete the work by the end of 2014. The plan consisted of the installation of a sewer pump to facilitate discharging effluent to the First Utility District sewer system.

Within 30 days of receipt of this letter please provide a revised CAP, including but not limited to, a schedule by which compliance with the permit will be achieved.

Please be aware that a failure to comply with your NPDES permit may subject you to enforcement action. Pursuant to T.C.A. §69-3-115, civil penalties may be assessed for each day a violation occurs or continues.

If you have any comments or questions, please contact Christy Morgan at (615) 532-0685.

Sincerely,

A handwritten signature in blue ink that reads "Jessica Murphy". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

Jessica Murphy  
Manager, Compliance and Enforcement Unit

EJM:CDM

cc: DWR – EFO-Knoxville  
DWR – Compliance File

Violations Report: BAM, Inc., August 2014 through June 2015

| Monitoring Period End Date | Parameter                | Minimum | Average | Maximum | Concentration Units |
|----------------------------|--------------------------|---------|---------|---------|---------------------|
| 02/28/2015                 | pH                       | 5.54    |         | 9.17    | SU                  |
| 01/31/2015                 | pH                       | 5.04    |         | 8.12    | SU                  |
| 06/30/2015                 | Copper, total [as Cu]    |         | .0779   | .0947   | mg/L                |
| 05/31/2015                 | Copper, total [as Cu]    |         | .141    | .349    | mg/L                |
| 04/30/2015                 | Copper, total [as Cu]    |         | .1223   | .197    | mg/L                |
| 03/31/2015                 | Copper, total [as Cu]    |         | .179    | .285    | mg/L                |
| 02/28/2015                 | Copper, total [as Cu]    |         | .442    | .9      | mg/L                |
| 01/31/2015                 | Copper, total [as Cu]    |         | .988    | 4.07    | mg/L                |
| 12/31/2014                 | Copper, total [as Cu]    |         | .645    | 1.73    | mg/L                |
| 11/30/2014                 | Copper, total [as Cu]    |         | .2133   | .396    | mg/L                |
| 10/31/2014                 | Copper, total [as Cu]    |         | .1185   | .17     | mg/L                |
| 09/30/2014                 | Copper, total [as Cu]    |         | 1.4045  | 4.27    | mg/L                |
| 08/31/2014                 | Copper, total [as Cu]    |         | .3925   | .889    | mg/L                |
| 06/30/2015                 | Chlorine, total residual |         | .055    | .08     | mg/L                |
| 05/31/2015                 | Chlorine, total residual |         | .06     | .1      | mg/L                |
| 04/30/2015                 | Chlorine, total residual |         | .065    | .1      | mg/L                |
| 03/31/2015                 | Chlorine, total residual |         | .025    | .05     | mg/L                |
| 02/28/2015                 | Chlorine, total residual |         | .09     | .22     | mg/L                |
| 01/31/2015                 | Chlorine, total residual |         | .066    | .12     | mg/L                |
| 12/31/2014                 | Chlorine, total residual |         | .025    | .05     | mg/L                |
| 11/30/2014                 | Chlorine, total residual |         | .065    | .1      | mg/L                |
| 10/31/2014                 | Chlorine, total residual |         | .13     | .19     | mg/L                |
| 09/30/2014                 | Chlorine, total residual |         | .045    | .18     | mg/L                |
| 08/31/2014                 | Chlorine, total residual |         | .054    | .15     | mg/L                |