

**BAM INC.**  
**10536 Lexington Dr.**  
**Knoxville, TN 37932**  
**Ph. 865-671-4010**  
**Fax. 865-671-2494**

TN DEPT OF ENVIRONMENT  
 AND CONSERVATION  
 SEP 21 2015

DIV OF WATER RESOURCES  
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 SEP 18 2015  
 DIV OF WATER RESOURCES  
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 AND CONSERVATION  
 RECEIVED

September 18, 2015

Ms. Jessica Murphy  
 Manager, Compliance and Enforcement Unit  
 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

**Response to Notice of Violation  
 NPDES Permit TN0081523**

Dear Ms. Murphy,

BAM is providing this letter in response to your Notice of Violation (NOV) letter dated August 17, 2015 and received on August 21, 2015 regarding the exceedances of the effluent limits in the NPDES permit. **On August 20, 2015, the discharge of cooling water to surface water under the NPDES permit was eliminated** when the facility began discharging all cooling water to the local sewer system operated by First Utility District (FUD). So the facility achieved compliance with the permit on that date.

As disclosed in the Corrective Action Plan (CAP) submitted on October 15, 2014, BAM scheduled a meeting with FUD to get approval to install a sewer pump station for discharge of the cooling water to the local sewer system. In the October 21st meeting, FUD expressed concerns that went beyond the scope of the cooling water discharge and requested additional information related to water usage and metering for the facility. This was unexpected and contributed to the delay in completing the CAP. At the end of December, FUD approved the cooling water discharge to the sewer system and began preparation of an agreement for accepting the discharge. BAM received the agreement in February, and the agreement was revised multiple times over the next several months by both BAM and FUD. The final agreement was signed at the beginning of June, and by mid June BAM had engaged a plumbing contractor to install the sewer pump station and associated piping. The contractor began work in mid July and completed the installation in mid August. BAM completed the piping connection from the cooling towers to the sewer pump station on August 20th. A complete timeline of the progress is summarized below.

Date	Activity
10/21/2014	BAM met with FUD to discuss cooling water discharge to sewer system.
12/04/2014	BAM provided water data (flow diagram, analytical sampling results) to FUD, as requested.
12/31/2014	FUD notified BAM that it would accept the cooling water under an agreement.
02/03/2015	FUD provided draft agreement, Memorandum of Understanding (MOU), to BAM.
03/11/2015	BAM provided comments on MOU to FUD.
04/17/2015	FUD provided revised MOU to BAM.
04/22/2015	BAM provided comments on MOU to FUD.
05/20/2015	FUD provided revised MOU to BAM.
06/05/2015	BAM signed MOU.

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Date	Activity
06/08/2015	FUD countersigned MOU.
06/12/2015	BAM issued purchase order to plumbing contractor for installation of sewer pump station.
07/15/2015	Plumbing contractor began work on sewer pump station.
08/18/2015	Plumbing contractor completed work on sewer pump station.
08/20/2015	BAM completed final connection of cooling water discharge to sewer pump station.

FUD informed us that they would be communicating the status of the project to TDEC personnel. Also during this time, Hassan Sanaat from the TDEC Knoxville Field Office visited the facility on multiple occasions to check on the status.

Since August 20th, BAM has not discharged any cooling water under the NPDEs permit and has continued to submit Discharge Monitoring Reports (DMRs) that reflect no discharge. If you have any questions or need additional information, please contact me (865-671-4010 x6223, tbyrd@bamknoxville.com ) or Kevin Parr at Strata Environmental (865-539-2077, kparr@strataenv.com).

Sincerely,



Tom Byrd  
Purchasing Manager & Safety Director  
BAM Inc.

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William R Snodgrass - TN Tower  
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