

TN0041939



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JUL 19 2016

TN DEPT. OF ENVIRONMENT
AND CONSERVATION
DIVISION OF WATER RESOURCES

July 13, 2016

Ms. Jessica Murphy
Division of Water Resources
Enforcement and Compliance Unit
Tennessee Tower
312 Rosa Parks Ave, 12th floor
Nashville, TN 37243-1102

This letter is submitted in response to the Notice of Violation (NOV) received from the Division of Water Pollution Control, which was dated June 14, 2016. Please note that the letter was not received at Teknor Apex until June 22, 2016.

We understand that the Division requires written explanation of the violations contained in the NOV. Please find enclosed a summary table describing the suspected cause, if known, and the corrective action(s) taken for each cited event.

For your reference I have also enclosed a copy of each letter that was prepared and submitted along with the DMR at the time each event occurred. This correspondence also described the cause and corrective action taken response to each reported exceedance. Note there are no hard copy letters for exceedances occurring in March and April, 2016 as we began submitting DMRs through NETDMR as of March 2016. In each of these instances the cause and corrective action were provided directly through NETDMR.

Sincerely,

A handwritten signature in cursive script that reads 'Susan Paris'.

Susan Paris

Environmental Manager

CC: Corportae

File

Jackson Field Office

TEKNOR APEX TENNESSEE COMPANY

751 NORTH DUPREE AVENUE • BROWNSVILLE, TN 38012 • TEL 731-772-3690 • FAX 731-772-4832 • WWW.TEKNORAPEX.COM

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TN DEPT. OF ENVIRONMENT AND CONSERVATION
DIVISION OF WATER RESOURCES

Notice of Violation Summary 2014 -2016

Corrective Action

Cause

Limit

Value
mg/L

Parameter

Outfall

Monitoring
Period

Added a culvert and eliminated the headwall

Erosion in the rip rap around the headwall in the outfall

40

50

TSS

002

Sep-14

Follow-up on sampling of the fire suppression water did not yield elevated solids

During this time period we were draining the fire suppression system. It is possible that this caused elevated solids.

40

50

TSS

001

Dec-14

This was an anomaly. There were no issues with BOD during the several years leading up to this sample, and the follow up samples were below 5 mg/L.

We conducted inspections of the outfall and were not able to identify a source for the elevated BOD

45

50

BOD

001

Dec-14

We make every effort to insure the sample bottles are new, clean and free of debris prior to sample collection.

The samples taken before the freezing weather were in compliance and the samples taken after the elevated solids sample were in compliance.

Just prior to this sampling event it was sleeting and snowing. We believe it is possible that this freeze thaw cycle caused the elevated solids.

40

92

TSS

001

Jan-16

We make every effort to insure the sample bottles are new, clean and free of debris prior to sample collection.

See above

40

64

TSS

002

Jan-16

Continue to evaluate ways to potentially increase storage capacity and process contaminated stormwater through our system at a higher rate.

This sample was taken during an underflow event. A permitted event that allows for process water discharge during large rain events. Our storage capacity for stormwater is based on a 25 year, 24 hour storm and equates to about 6.5 inches of rain.
This rain event (7.2 inches) exceeded the design capacity (6.5 inches) our storage systems.
The 25 year 24 hours design is based on EPA guidance for design capacity for freeboard in tank farm secondary containment systems. This is the first underflow event in the past 4 years.

0.044

0.053

DEHP

001

Mar-16

Concrete repairs will be made in June or July, when rain in not as likely to impact the disturbed soil.

Erosion in the rip and soil around the culvert of the drive way crossing over Outfall 002headwall in the outfall

40

85

TSS

002

Mar-16

The others parameters, including DEHP, which was below detection limits) were in compliance.

We conducted inspections of the outfall and were not able to identify a source for the elevated O&G due to the very elevated results, we believe it is possible that the sample might have been contaminated.

15

98.7

O&G

001

Apr-16

Concrete repairs will be made in June or July, when rain in not as likely to impact the disturbed soil.

Erosion in the rip rap and soil around the culvert of the drive way crossing over Outfall 002headwall in the outfall

40

46

TSS

002

Apr-16



TEKNOR APEX TENNESSEE COMPANY

A Subsidiary of TEKNOR APEX COMPANY

Jan 14, 2015

Water Pollution Control Division
Compliance Review Section
William R. Snodgrass Tennessee Tower, 11th Floor
312 Rosa L. Parks Avenue
Nashville, TN 37243

Re: Permit # TN0041939

To Whom It May Concern:

The purpose of this letter is to supply the Division with additional information regarding the December 2014 DMR.

The following parameter exceeded the permit limit during the month of December.

Outfall 001

<u>Date</u>	<u>TSS (mg/L)</u>
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12/22	50
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During this time period we were draining the fire suppression system. It is possible that this caused elevated solids. In order to confirm this, we will take a sample of the water the next time the system is drained.

Outfall 001

<u>Date</u>	<u>BOD (mg/L)</u>
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12/15	50
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We were not able to identify a potential source for the elevated BOD. We have not had issues with BOD for the past several years, so this is a bit of an anomaly. We have three sets of BOD data since this date and they have all been below 5 mg/L, which is typical of our stormwater.

If you have any questions please contact me at 731-519-1304.

Sincerely,

Susan Paris
Environmental Manager

CC: Corporate and File



TEKNOR APEX TENNESSEE COMPANY

A Subsidiary of TEKNOR APEX COMPANY

October 8, 2014

Water Pollution Control Division
Compliance Review Section
William R. Snodgrass Tennessee Tower, 11th Floor
312 Rosa L. Parks Avenue
Nashville, TN 37243

Re: Permit # TN0041939

To Whom It May Concern:

The purpose of this letter is to supply the Division with additional information regarding the September 2014 DMR.

The following parameter exceeded the permit limit during the month of September.

Outfall 002

<u>Date</u>	<u>TSS (mg/L)</u>
09/11	50

As indicated earlier, we have discovered a potential source of solids in Outfall 002. There appears to be some erosion in the rip rap around a headwall in the main Outfall 002 channel. In order to stabilize this area, we plan to add a culvert and eliminate the headwall. We plan to conduct this work beginning mid-October and finishing by mid-November.

If you have any questions please contact me at 731-519-1304.

Sincerely,

Susan Paris
Environmental Manager

CC: Corporate and File



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JUL 19 2016

TN DEPT. OF ENVIRONMENT
AND CONSERVATION
DIVISION OF WATER RESOURCES

February 8, 2016

Water Pollution Control Division
Compliance Review Section
William R. Snodgrass Tennessee Tower, 11th Floor
312 Rosa L. Parks Avenue
Nashville, TN 37243

Re: Permit # TN0041939

To Whom It May Concern:

The purpose of this letter is to supply the Division with additional information regarding the January 2016 DMR.

The following parameter exceeded the permit limit during the month of January.

Outfall 001		Outfall 002	
Date	TSS (mg/L)	Date	TSS (mg/L)
1/26	92	1/26	64
Avg	37		

Just prior to this sampling event it was sleeting and snowing. We believe it is possible that this freeze thaw cycle caused elevated solids. The samples taken before the freezing weather were in compliance and the samples taken 2/1, first samples after the 1/26 samples, were also in compliance.

We were not able to identify any other potential sources for the elevated solids. We have not had issues with TSS since December of 2014, so this is a bit of an anomaly.

If you have any questions please contact me at 731-519-1304.

Sincerely,

Susan Paris
Environmental Manager

CC: Corporate and File