



STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
COOKEVILLE ENVIRONMENTAL FIELD OFFICE
DIVISION OF WATER RESOURCES
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Mr. Brett Burris, Plant Manager
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P.O. Box 279
Carthage, TN 37030

May 22, 2019

RE: Bon-L Manufacturing Compliance Evaluation Inspection (CEI), NPDES Number: TN0002589

Dear Mr. Myers:

Division of Water Resources staff wishes to thank you and your staff for your generous time and courtesy during the recent Compliance Evaluation Inspection (CEI) performed on May 15, through May 16, 2019 at the Carthage Manufacturing Facility in Smith County. The inspection included a review of the treatment plant and laboratory.

Compliance Biomonitoring Testing

The biomonitoring tests were completed and passed as required prior to the 180 day cut-off period after the issuance of the current NPDES permit.

Permit

Bonnell's current NPDES permit will expire on May 31, 2022. The permit was available for review. Permit language for representative sampling and composite sampling was reviewed. The permit language does not require flow composite sampling. It requires 24 hour grab sampling to meet the composite sampling definition for this permit. See: definitions on page 4 of 22 in the NPDES permit.

Records and Reports

The electronic records were readily available for review. Mr. Barry Cohoon provided access to electronic spreadsheets. The Discharge Monitoring Reports were reviewed from the start of this permit cycle. Exceedances were not observed. Chain of Custody documents were reviewed.

Facility Site Review

The presses for the removal of trivalent chromium and aluminum were reviewed. Dry storage of some material was discussed in order to reduce weight of the material going to an approved landfill. It was noted that a mix box or flock box on one of the clarifiers showed signs of mild corrosion. Mr. Cohoon stated that he is currently researching the replacement of this box with a stainless steel unit. A small quantity of de-foamer is being drip fed into the effluent just above the parshall flume. A safety data sheet for the material was provided and discussed. The process for the removal of ammonia (gaseous release) was observed.

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Laboratory

The laboratory was reviewed and found to be in good order. The pH testing was discussed with Mr. Don Birdwell. The pH test is the only test performed on site for permit compliance. It was found to be in good order. It is recommended that a commercial pH probe storage solution be utilized. This may improve the long term performance of the pH meter's probe.

Automated Sampler

The automated sampler was reviewed and found to be in working order. The sampler is not wired into the flow meter for flow composite sampling. To reiterate, the permit does not specifically require flow composite sampling. Tubing on the sampler should be replaced on an appropriate schedule. This reduces cloudiness in the tubing and possibly eliminates inaccuracies in analyses.

Effluent/Receiving Waters

The effluent was observed and found to be clear. The receiving stream (Caney Fork River) was clear with no apparent odor. No visible foam was observed at the effluent discharge. The effluent discharge sign was in place. The sign was impacted by recent flooding and in need of minor maintenance. The maintenance issues were promptly addressed.

The Division of Water Resources would again like to thank you, Mr. Barry Cohoon and Mr. Don Birdwell for your time and courtesy during this inspection.

If you have any questions, you may contact Oakley Hall in Cookeville by way of telephone at (931) 520-6688 or toll free at 1-(888)-891-8332. You may also use electronic mail at: Oakley.Hall@tn.gov.

Sincerely,



Mr. Brad Ulmer

Environmental Field Office Manager
Division of Water Resources

cc: EFO-CK, Smith County DWR Files: TN0002589