



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

Memphis Environmental Field Office
8383 Wolf Lake Drive
Bartlett, TN 38133
Phone 901-371-3000 Statewide 1-888-891-8332 Fax 901-371-3170

CERTIFIED MAIL 91 7108 2133 3932 2020 8244
RETURN RECEIPT REQUESTED

June 20, 2016

Mr. Jamie B. Iskiwitz
Iskiwitz Metal Company
604 Marble Avenue
Memphis, TN 38107

Re: **Notice of Violation**
 Compliance Evaluation Inspection (CEI)
 Iskiwitz Metal Company
 Tennessee Multi-Sector Storm Water Permit (TMSP) Tracking Number TNR054012
 Shelby County

Dear Mr. Iskiwitz,

On June 9, 2016, Mrs. Maylynne Wilbert with the Tennessee Department of Environment and Conservation, Division of Water Resources, Memphis Environmental Field Office (TDEC/DWR/MEFO), conducted a site inspection at the Iskiwitz Metal Company site located at 604 Marble Avenue in Memphis, Tennessee. The purpose of the CEI is to determine the facility's compliance with coverage under the TMSP. This is accomplished by review of the facility's self-monitoring records and reports and conducting an inspection of the areas on site exposed to storm water. Your availability and assistance during the inspection was greatly appreciated.

Attached you will find a copy of the NPDES Compliance Inspection Report, which summarizes the findings of the inspection, along with photographs taken during the inspection. At this time, Iskiwitz Metal Company's self-monitoring program is not in compliance with the terms and conditions of the TMSP for the following reasons:

1. 2013-2015 quarterly visual inspection records of designated equipment, storage areas, etc. were unavailable for review at the time of the inspection. Mrs. Wilbert was informed by you that

quarterly visual inspections are not being performed. At the time of the inspection, Mrs. Wilbert informed you of the requirement under Section 3.2.3.3 of Sector N of the TMSP.

2. 2013-2015 quarterly visual inspection records of Outfall SW1 (during wet-weather conditions) were unavailable for review at the time of the inspection. Mrs. Wilbert was informed by you that these inspections are not being performed. At the time of the inspection, Mrs. Wilbert informed you of the requirement under Section 5.3 of Sector N of the TMSP.
3. Annual Comprehensive Site Compliance Inspection records were unavailable for review at the time of the inspection. Mrs. Wilbert was informed by you that these inspections are not being performed. At the time of the inspection, Mrs. Wilbert informed you of the requirement under Section 3.2.4 of Sector N of the TMSP.
4. Metal scrap materials both bailed and un-bailed were observed north of the site. Metal scrap materials and other debris were observed near two storm drains located in these areas, and accumulated sediment and debris was observed within the storm drains. Mrs. Wilbert was informed by you that the storm drains are cleaned out 2-3 times per year. The Division requires that appropriate best management practices (BMPs) be implemented in these areas to prevent pollutants from entering the storm drains. Additionally, due to the condition of the storm drains at the time of the inspection, the Division recommends that the drains be cleaned more than 2-3 times per year.
5. 2013-2015 Annual Storm Water Monitoring Report and corresponding analytical reports and chains of custody for storm water Outfall SW1 were available and reviewed. A review of the results revealed zinc exceeded the Cut-off Concentration Limit (0.395 mg/L) during the 2015 monitoring period. The result reported was 2.444 mg/L which is approximately 6 times above the limit. No explanation regarding the likely cause of the exceedance was provided with the report as required by the permit. Section 5.1.2 of Sector N of the TMSP requires that a description of the likely cause of the exceedance be submitted along with the reports within 30 days from the time storm water monitoring results were received. Furthermore, within 60 days from the time storm water monitoring results were received, the facility must review its SWPPP, make any modifications or additions to the plan which would assist in reducing runoff concentrations to less than the monitoring cut-off concentrations for that parameter, and submit to the local EFO a summary of the proposed SWPPP modifications (including a timetable for implementation).
6. A Storm Water Pollution Prevention Plan (SWPPP) was available on site at the time of the inspection. A review of the facility's SWPPP revealed that it was written on November 16, 2005 and was signed by a Professional Engineer. However, the SWPPP was not signed by you. At the time of the inspection, Mrs. Wilbert informed you that part 4.3 of the TMSP requires that the SWPPP be reviewed at least annually to ensure information is up to date and accurate. The SWPPP should also be signed in accordance with subpart 7.7 (Signatory Requirements) of the TMSP. In addition, while the SWPPP did contain an employee training schedule (annually for long term employees and during the first 90 days for new employees), it is recommended that training records be maintained. Lastly, the SWPPP needs to be updated to include other drainage areas onsite as required under 5.1.4 of Sector N of the TMSP as well as an explanation of why other outfalls onsite are expected to discharge identical effluents.

7. At the time of the inspection, no discharge was observed at Outfall SW1 or any of the other observed storm drains. Stockpiles of bailed scrap metal were observed adjacent to the outfall. Although no metal debris was observed inside the storm drain at the time of the inspection, the Division recommends that the bailed materials be stored in an area not in close proximity to the storm drain to ensure that small pieces of scrap metal don't migrate into the drain

Required Action(s):

- On or before **July 20, 2016**, submit a written response addressing the issues mentioned above.

All correspondence should be mailed to the Division of Water Resources, Memphis Environmental Field Office (DWR, MEFO) at the address shown below.

Tennessee Department of Environment and Conservation
Division of Water Resources
Memphis Environmental Field Office
8383 Wolf Lake Drive
Bartlett, TN 38133

The Division greatly appreciates your prompt attention and cooperation in this matter. Compliance with the terms and conditions of the permit helps ensure that the state's waters are being protected from harmful pollutants which could cause or contribute to the stream's impairment. If you have any questions regarding the inspection or the compliance inspection report, please contact Maylynne Wilbert at (901) 371-3024 or Maylynne.Wilbert@tn.gov.

Sincerely,



Joellyn Brazile
Environmental Program Manager
Division of Water Resources
Memphis Environmental Field Office

Enclosure: NPDES Compliance Evaluation Inspection Report, ICIS Form, CN-1068 Inspection Checklist, Photo Document

cc: TDEC/DWR/MEFO - file
ec: TDEC/DWR/NCO, Enforcement and Compliance Section



TDEC - Division of Water Resources
Memphis Field Office

ICIS NPDES Facilities Inspection Report

Facility Data

NPDES ID:	TNR054012	Facility Site Name	Iskiwitz Metal Company		
		Address	604 Marble Avenue, Memphis, TN 38107		
Permit Eff. Date:	May 8, 2015	Permit Exp Date:	Apr 14, 2020	SIC Code:	5093

Compliance Monitoring Information

Compliance Monitoring Activity Name	Compliance Evaluation (non-sampling) (CEI)				
	* If Bio Monitoring is selected above, select the method used:				
Compliance Monitoring Activity	Evaluation				

Compliance Monitoring Dates/Times

Entry Date/Time (mm/dd/yyyy hh:mm):	6/9/16 9:30	Exit Date/Time (mm/dd/yyyy hh:mm):	6/9/16 12:00
-------------------------------------	-------------	------------------------------------	--------------

Facility Representatives

Jamie Iskiwitz, Vice President, (901) 526-8944	Jamie Iskiwitz, Vice President, (901) 526-8944
On-Site Representative(s) Title, Phone Number	Responsible Official(s), Title, Phone Number

Statute and Section Information

Federal Statute:	CWA - Clean Water Act	State Statute:	Tennessee Water Quality Control Act	
Programs:	NPDES- Base Program (Limits, Reporting, & Schedule)			
Compliance Monitoring Reason:	Core Program			
Compliance Monitoring Agency Type:	State	Agency Name:	TDEC - DWR	
Did EPA assist/ Inspection?	No	Time Physically conducting activity:	Days: 1	Hours:
Inspection Type:	State	Compliance Monitoring Action Outcome:		
Lead Agency:	State	Compliance Monitoring Rating Code:	Unrated	
If Joint Inspection, what was the purpose of the other party?				

Areas Evaluated During Inspection (Check only those areas evaluated)

<input type="checkbox"/> Permit	<input checked="" type="checkbox"/> Self - Compliance Program	<input type="checkbox"/> Pretreatment
<input checked="" type="checkbox"/> Records / Records	<input type="checkbox"/> Compliance Schedule	<input checked="" type="checkbox"/> Pollution Prevention
<input checked="" type="checkbox"/> Facility Site Review	<input checked="" type="checkbox"/> Laboratory	<input checked="" type="checkbox"/> Storm Water
<input checked="" type="checkbox"/> Effluent / Receiving Waters	<input checked="" 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

See attached inspection report and/or letter
--

EPA and State Representatives

Maylynne Wilbert	TDEC/DWR/901-371-3024	6/20/16
Inspector's Signature	Agency / Office / Phone	Date
John Blangle	TDEC/DWR/901-371-3025	6/20/16
Manager's Signature	Agency / Office / Phone	Date

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

**TENNESSEE DEPARTMENT OF ENVIRONMENT AND CONSERVATION**

Division of Water Resources

William R. Snodgrass Tennessee Tower, 312 Rosa L. Parks Avenue, 11th Floor, Nashville, Tennessee 37243
1-888-891-8332 (TDEC)**Tennessee Multi-Sector General NPDES Permit (TMSP) Compliance Inspection Report**

Facility Name:	Iskiwitz Metals	NPDES Tracking Number: TNR	TNR054012
Street Address:	604 Marble Avenue	County:	Shelby
Facility SIC Code(s):	5093 - - -	TMSP Sector(s):	N - - - - -
Inspection Date:	June 9, 2016	Effective Date:	08-MAY-15
Time of Entry:	9:30am	Time of Exit:	12:00pm

Notice of Coverage (NOC) and Stormwater Pollution Prevention Plan (SWPPP)

	Yes	No	N/A
Is the facility's NOC retained on-site or available upon request?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Has the facility developed and maintained a SWPPP?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Does the SWPPP include: a detailed site map identifying drainage, outfalls, pollutant potential areas and BMPs	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
an inventory of potential pollutant sources?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
a pollution prevention team?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
a list of measures and controls to prevent pollution?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
a description of good house keeping practices?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
a list of erosion prevention and sediment controls?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
a list of significant spills and leaks of toxic and hazardous pollutants?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
a description of spill prevention and response procedures?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
a certification page signed by the appropriate authority?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
a description of employee training and dates delivered?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
a certification of testing for presence of non-storm-water discharge?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Quarterly Visual Examination of Stormwater Quality

	Yes	No	N/A
Has the permittee performed quarterly visual examinations in accordance with the requirements of the TMSP?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Are the visual examination reports retained on-site or available upon request?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Stormwater Monitoring

	Yes	No	N/A
Has the permittee performed stormwater monitoring at all of the outfalls?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Have all of the required parameters been monitored?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Have the samples been collected in accordance with the requirements of the TMSP and/or 40 CFR?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Are the monitoring reports and associated documentation retained on-site or available upon request?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Did the facility notify the Division within the required time frame if benchmark exceedances occurred?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comprehensive Site Compliance Evaluations and Inspections

	Yes	No	N/A
Has the permittee performed annual comprehensive site compliance evaluations?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Has the permittee performed any required site inspections?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Are the evaluations and inspection records retained on-site or available upon request?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Facility BMP Review

	Yes	No	N/A
Are the site BMPs in accordance with the SWPPP?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Have the BMPs been installed correctly and maintained?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Have good housekeeping measures been implemented and maintained?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Outfall and Receiving Waters (where applicable)

	Outfall # <u>SW1</u>	Outfall # _____
Was an outfall discharging at time of inspection? If yes, explain observations (source/color/odor/foam/scum/solids etc.).	No	
Condition of receiving water upstream from the outfall?	Not determined at this time	
Condition of receiving water _____ feet downstream of the outfall?	Not determined at this time	
Condition of receiving water _____ feet downstream of the outfall?	Not determined at this time	

Observations and Comments:

Please see comments on the inspection report.

On-Site Contact Person:

Print Name: _____

Title: _____ Date: _____

Signature: _____

Phone: _____

Email: _____

DWR Inspector:

Print Name: __ Maylynne Wilbert _____

Title: __ Program Coordinator__ Date: __6/9/2016__

Signature: Maylynne Wilbert

Phone: __ (901) 371-3024 _____

Email: __ maylynne.wilbert@tn.gov _____

Site Name: Iskiwitz Metal Company
Tracking No: TNR054012
Location: 604 Marble Avenue, Memphis, TN 38107
Date of Inspection: June 9, 2016
Inspector(s): Maylynne Wilbert (DWR)
Onsite contact(s): Jamie B. Iskiwitz (Vice President)

Observations and Comments:

On June 9, 2016, Mrs. Maylynne Wilbert with the Tennessee Department of Environment and Conservation, Division of Water Resources, Memphis Environmental Field Office (TDEC/DWR/MEFO) met with Mr. Jamie Iskiwitz at the Iskiwitz Metal site located at 604 Marble Avenue in Memphis, TN to review the facility's monitoring records and to discuss the facility's self-monitoring program. The following is a summary of Mrs. Wilbert's findings and observations during and after the inspection.

The Iskiwitz Metal Company is covered under the Tennessee Multi-Sector Storm Water Permit (TMSP) and has been assigned the tracking number TNR054012. The TMSP authorizes the facility to discharge storm water associated with industrial activity via storm drains onsite that ultimately discharges into the Mississippi River. The Iskiwitz Metal Company obtained coverage under the TMSP on May 8, 2015, and coverage expires on April 14, 2020.

The facility falls under Sector N (Storm water Discharges Associated with Industrial Activity from Scrap Recycling and Waste and Recycling Facilities) of the TMSP, Standard Industrial Classification (SIC) code 5093. Under Sector N (SIC 5093), quarterly visual inspections of designated equipment, storage areas, etc. (recommended during dry weather conditions), quarterly visual inspections of outfalls (during wet-weather conditions), annual storm water sampling (Chemical Oxygen Demand (COD), Total Suspended Solids (TSS), Aluminum (Al), Copper (Cu), Iron (Fe), Lead (Pb), and Zinc (Zn)), and an annual comprehensive site compliance evaluation must be performed, and records of these inspections and sampling records must be maintained.

I. Records/Reports

At the time of the inspection, a copy of the facility's Notice of Coverage (NOC), Storm Water Pollution Prevention Plan (SWPPP) written/updated on November 16, 2005, and 2013-2015 Annual Storm Water Monitoring Reports and corresponding laboratory results and Chains of

Custody were available for review. However, the following documents were unavailable during the inspection:

- 2013-2015 quarterly visual inspection records of designated equipment, storage areas, etc. A template to record quarterly visual inspections was available for review. However, according to Mr. Iskiwitz, visual inspections are currently not being performed. At the time of the inspection, Mrs. Wilbert informed Mr. Iskiwitz of the requirement under Section 3.2.3.3 of Sector N of the TMSP.
- 2013-2015 quarterly visual inspection records of Outfall SW1 (during wet-weather conditions). According to Mr. Iskiwitz, visual inspections of the discharge at Outfall SW1 are currently not being performed. At the time of the inspection, Mrs. Wilbert informed Mr. Iskiwitz of the requirement under Section 5.3 of Sector N of the TMSP.
- Annual Comprehensive Site Compliance Inspection records. According to Mr. Iskiwitz, these inspections are currently not being performed. At the time of the inspection, Mrs. Wilbert informed Mr. Iskiwitz of the requirement under Section 3.2.4 of Sector N of the TMSP.

II. Facility Site Review

- Iskiwitz Metal Company is a metal scrap recycling facility and according to information in the Storm Water Pollution Prevention Plan (SWPPP), the facility receives non-ferrous metals. The non-ferrous metals are processed, sorted, and shipped to mills and processors.
- The site inspection revealed that the 1-acre site has three storm drains, which convey storm water runoff associated with industrial activities onsite. However, according to the Notice of Intent (NOI) and Mr. Iskiwitz, storm water from the facility flows northward into the storm drain located near the northern boundary of the property and is designated as Outfall SW1 (photos 1-2). Rainwater flows across paved areas that flow to the outfall. No debris was observed inside the storm drain.

According to 5.1.4 of Sector N of the TMSP, when a facility has two or more outfalls that, based on a consideration of industrial activity, significant materials, and management practices and activities within the area drained by the outfall, and the permittee reasonably believes discharge substantially has identical effluents, the permittee may test the effluent of one of such outfalls and report that the quantitative data also applies to the substantially identical outfall(s) provided that the permittee includes in the storm water pollution prevention plan (SWPPP) a description of the location of the outfalls and explains in detail why the outfalls are expected to discharge

substantially identical effluents. The permittee shall include the description of the location of the outfalls, explanation of why outfalls are expected to discharge substantially identical effluents, and provide estimate of the size of the drainage area and runoff coefficient with the TMSP Stormwater Monitoring Report. Based on the review of the facility's SWPPP, only one outfall (SW1) is mentioned. The Division requires that Iskiwitz Metal Company revise the SWPPP to include all drainage areas onsite as mentioned in 5.1.4 of Sector N of the TMSP as well as explain why other outfalls are expected to discharge identical effluents.

- Metal scrap materials both bailed and un-bailed were observed north of the site (photos 3-5). Metal scrap materials, sediment, and other debris were observed near two storm drains located in these areas, and accumulated sediment and debris was observed in the storm drains (photos 6-9). According to Mr. Iskiwitz, the storm drains are cleaned out 2-3 times per year. The Division requires that appropriate best management practices (BMPs) be implemented in these areas to prevent pollutants from entering the storm drains. Additionally, due to the condition of the storm drains at the time of the inspection, the Division recommends that the drains be cleaned more than 2-3 times per year.
- As mentioned in Part I of this report, the 2013-2015 Annual Storm Water Monitoring Report and corresponding analytical reports and chains of custody for storm water Outfall SW1 were available and reviewed. A review of the results revealed zinc exceeded the Cut-off Concentration Limit (0.395 mg/L) during the 2015 monitoring period. The result reported was 2.444 mg/L which is approximately 6 times above the limit. No explanation regarding the likely cause of the exceedance was provided with the report as required by the permit. Section 5.1.2 of Sector N of the TMSP requires that a description of the likely cause of the exceedance be submitted along with the reports within 30 days from the time storm water monitoring results were received. Furthermore, within 60 days from the time storm water monitoring results were received, the facility must review its SWPPP, make any modifications or additions to the plan which would assist in reducing runoff concentrations to less than the monitoring cut-off concentrations for that parameter, and submit to the local EFO a summary of the proposed SWPPP modifications (including a timetable for implementation).

III. Effluent/Receiving Waters

At the time of the inspection, scrap materials and debris were observed in two storm drains on the Iskiwitz Metal Company site. Please refer part II of the CEI report for further details.

IV. Self-Compliance Program

At this time, Iskiwitz Metal Company is not in compliance with the terms and conditions of the TMSP. Please refer to Section I, II, III, V, VI, and VII of the CEI report for further details.

V. Operations and Maintenance

Based on observations during the inspection, Iskiwitz Metal Company does not appear to be adequately maintaining areas onsite exposed to storm water.

VI. Pollution Prevention

A Storm Water Pollution Prevention Plan (SWPPP) was available on site at the time of the inspection. A review of the facility's SWPPP revealed that it was written on November 16, 2005 and was signed by a Professional Engineer. However, the SWPPP was not signed by Mr. Iskiwitz. At the time of the inspection, Mrs. Wilbert informed Mr. Iskiwitz that part 4.3 of the TMSP requires that the SWPPP be reviewed at least annually to ensure information is up to date and accurate. The SWPPP should also be signed in accordance with subpart 7.7 (Signatory Requirements) of the TMSP. In addition, while the SWPPP did contain an employee training schedule (annually for long term employees and during the first 90 days for new employees), it is recommended that training records be maintained.

Please also refer to part II of the CEI report regarding updating the SWPPP to include other drainage areas onsite as required under 5.1.4 of Sector N of the TMSP as well as an explanation of why other outfalls onsite are expected to discharge identical effluents.

VII. Storm Water

At the time of the inspection, no discharge was observed at Outfall SW1 (photos 1-2) or any of the other observed storm drains. Stockpiles of bailed scrap metal were observed adjacent to the outfall. Although no metal debris was observed inside the storm drain at the time of the inspection, the Division recommends that the bailed materials be stored in an area not in close proximity to the storm drain to ensure that small pieces of scrap metal don't migrate into the drain.

Photographic Log

Facility Name: Iskiwitz Metal Company		Site Location: 604 Marble Avenue, Memphis, TN 38107	Permit No.: TNR054012
---	--	--	---------------------------------




Photo No. 1	Date 6/9/2016	
Description <p>Storm water from the facility flows northward into the storm drain located near the northern boundary of the property and is designated as Outfall SW1.</p> <p>Outfall SW1 is denoted by the yellow circle.</p>		

Photo No. 2	Date 6/9/2016	
Description <p>Close-up view of Outfall SW1.</p> <p>Stockpiles of bailed scrap metal were observed adjacent to the outfall. Although no metal debris was observed inside the storm drain at the time of the inspection, the Division recommends that the bailed materials be stored in an area not in close proximity to the storm drain to ensure that small pieces of scrap metal don't migrate into the drain.</p>		

Photographic Log

Facility Name: Iskiwitz Metal Company		Site Location: 604 Marble Avenue, Memphis, TN 38107	Permit No.: TNR054012
Photo No. <div style="text-align: center;">3</div>	Date <div style="text-align: center;">6/9/2016</div>		
Description View of metal scrap materials facing north.			

Photo No. <div style="text-align: center;">4</div>	Date <div style="text-align: center;">6/9/2016</div>		
Description View of metal scrap materials facing northwest.			

Photographic Log


Facility Name: Iskiwitz Metal Company		Site Location: 604 Marble Avenue, Memphis, TN 38107	Permit No.: TNR054012
Photo No. <div style="text-align: center;">5</div>	Date <div style="text-align: center;">6/9/2016</div>		
Description View of metal scrap materials facing northeast.			

Photo No. <div style="text-align: center;">6</div>	Date <div style="text-align: center;">6/9/2016</div>		
Description View of a storm drain (denoted with the yellow circle) located north of the processing building. Metal scrap materials, sediment, and debris were observed near and around this storm drain, which for reporting purposes will be designated as SD1.			

Photographic Log


Facility Name: Iskiwitz Metal Company		Site Location: 604 Marble Avenue, Memphis, TN 38107	Permit No.: TNR054012
Photo No. 7	Date 6/9/2016		
Description Close-up view of SD1. Accumulated sediment and debris was observed within the storm drain at the time of the inspection.			

Photo No. 8	Date 6/9/2016	
Description View of a storm drain (denoted by a yellow circle) located northwest of the processing building. Metal scrap materials, sediment, and debris were observed near this storm drain, which for reporting purposes will be designated as SD2.		

Photographic Log

Facility Name: Iskiwitz Metal Company		Site Location: 604 Marble Avenue, Memphis, TN 38107	Permit No.: TNR054012
Photo No. 9	Date 6/9/2016		
Description Close-up view of SD2. Accumulated sediment was observed within the storm drain at the time of the inspection.			