STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
DIVISION OF WATER RESOURCES
CHATTANOOGA ENVIRONMENTAL FIELD OFFICE
1301 RIVERFRONT PKWY, SUITE 206
CHATTANOOGA, TENNESSEE 37402-2013

July 8, 2021

Ms. Karen Barrios
Plant Manager
Johns Manville
2235 Highway 411 North
PO Box 309
Etowah, TN 37331

Re: **Compliance Evaluation Inspection (CEI)**
NPDES Permit: TN0042064
TMSP Permit: TNR051828
Johns Manville
2235 Highway 411 North
McMinn County

Dear Ms. Barrios:

On June 16, 2021, Mr. Michael Bascom of the Division of Water Resources (DWR) performed a Compliance Evaluation Inspection for the above referenced facility. He met with Mr. Scott Lane and Ms. Jennifer Sylvester, who provided information during the inspection. The purpose of the inspection was to evaluate Johns Manville's compliance with the terms and conditions of the National Pollutant Discharge Elimination System (NPDES) permit, NPDES Permit Tracking Number TN0042064 and TMSP Permit Tracking Number TNR051828.

I. Permit Verification

Johns Manville has coverage under the National Pollutant Discharge Elimination System, NPDES Permit Tracking Number TN0042064 which became effective on June 1, 2017 and expires on May 31, 2022. The permit authorizes Johns Manville to discharge treated process wastewater, non-process wastewater, and treated landfill leachate to Cane Creek (Crockett Spring Branch) at mile 1.2.

During the inspection, the outfalls were inspected and the outfall locations were found to be in agreement with the above referenced permit.

Johns Manville has coverage under the Tennessee Multi-sector Permit Tracking Number TNR051828, Sector E, V, P which became effective on July 20, 2020 and expires on June 30, 2022. The permit authorizes Johns Manville to discharge its storm water runoff to Cane Creek. A copy of the Notice of Coverage (NOC) and Notice of Intent (NOI) were available onsite.

II. Records and Reports

During the inspection, Mr. Lane presented the NPDES Permit, the Storm Water Pollution Prevention Plan (SWPPP), and discharge monitoring reports (DMR) for the facility. Mr. Bascom verified all of the outfalls for the facility.

Johns Manville performs all testing required by their permit and submits Discharge Monitoring Reports monthly as required by their permit. The facility keeps three years of records and reports on site and available for review. Johns Manville did not discharge during the 2018 to 2021 period.

Mr. Bascom reviewed the facility's WWTPs Monthly Operating Reports and corresponding bench sheets for April 2020 and March 2021. Mr. Bascom noted a few transcription errors and discussed them with the operator.

III. Facility Site Review

Johns Manville is a facility for manufacturing fiberglass and matting for roofing shingle and carpet industries, SIC codes, 3229 and 2297. The facility is located on 142 acres in McMinn County with only 72 acres being used by the manufacturing facility. Manufacturing occurs within the facility's main building is 473,000 sq. ft. and the total for all buildings on site is 700,000 sq. ft. The facility also includes a wastewater treatment plant for treatment of process water. The facility employs approximately 220 people and operates 24 hours per day, 7days per week.

Johns Manville is primarily engaged in bonding glass fibers onto matting. Johns Manville uses "white water" (water combined with chemical modifiers which turns the water white) to transport glass fiber. After use solids and modifiers are removed from waste "white water" by adjusting pH and mixing it with a flocculent. The water is then sent to the ponds and then to the onsite WWTP. The facility typically does not discharge through its Outfall. Instead, wastewater is discharged to Etowah WWTP. According to personnel, the volume of wastewater sent to Etowah WWTP is approximately 94,000 GPD. There have been no releases via the NPDES Outfall (001) during this permit cycle.

Drainage Area A (northwestern portion of the facility) is 65 acres and contains the following buildings: main production warehouse, rail yard, several storage buildings, raw material storage areas, wastewater treatment pond 3 and a stormwater detention pond. Drainage Area A includes the following operations: unloading raw materials via rail and truck, wastewater treatment chemicals, cooling towers, hazardous material storage, oxygen farm tanks, petroleum storage

tanks, and transformer yards. At the rail unloading area, Mr. Bascom observed some raw material on the ground in between railroad tracks. Mr. Lane stated that personnel clean these areas daily.

Drainage Area B (northeastern portion of the facility) is 33.2 acres and contains the following: main operations warehouse, finished product storage and loading areas, UST containing kerosene, and small detention pond. Drainage Area B includes the following operations: truck loading/unloading. Mr. Bascom observed that the bulk unloading area has secondary containment (sloped with a sump at one end). Tankers unload via quick connect.

Drainage Area C (area east of the facility) is 36.4 acres and contains the following: wastewater treatment pond 2 and a large undeveloped area. Drainage Area C includes the following operations: None.

Drainage Area D (western portions of the facility) is 4 acres and contains the following: wastewater treatment plant including tanks, sludge drying beds, wastewater treatment pond 1 and rail car staging area. Drainage Area D includes the following operations: wastewater treatment, wastewater treatment chemical storage and sludge drying beds.

IV. Effluent/Receiving Stream

Treated process water from the WWTP is sent to the POTW (Etowah WWTP) via Pond 2. Mr. Bascom observed the effluent at the weir box (NPDES outfall) and found that the effluent had no visible sheen, color contrast, or foam. He also observed that the NPDES Outfall sign was in place and legible. During the inspection, Mr. Bascom visually inspected all the stormwater outfalls; all of which were dry.

V. Flow Measurement

The primary flow measurement device at Outfall 001 is a 45° v-notch weir and the secondary flow measurement device an ISCO 4210 flow meter. Personnel provided logs to document flow measurement is checked against the staff gage. The facility calibrates the ISCO 4210 flow meter annually. The ultrasonic flow meter is also calibrated annually.

Mr. Bascom confirmed the temperature was < 4 °C of the composite sampler at Outfall 001.

VI. Laboratory

Johns Manville WWTP laboratory performs DO, pH, TSS, Oil & Grease, Ammonia, BOD, and COD that is reported on their MORs. Whole Effluent Toxicity (WET) is required once each permit cycle. WET has not conducted during as of June 16 ,2021.

VII. Sludge Handling/Disposal (or Disposal)

At the onsite WWTP, flocculant is added to process water. Solids are removed from process water by a centrifuge and the sludge is sent to a landfill. Domestic sewage is sent to Etowah WWTP.

VIII. Pollution Prevention and Storm Water

Mr. Bascom reviewed copies of the Notice of Coverage (NOC) and Notice of Intent (NOI), Storm Water Pollution Prevention Plan (SWPPP). The Storm Water Pollution Prevention Plan (SWPPP) contained signed certification statement, pollution prevention team, and site plan. Mr. Bascom reviewed copies of quarterly visual inspections for 2018, 2019, and 2020. The facility submitted Annual Stormwater monitoring for 2018, 2019 and 2020.

Operation and Maintenance

The facility is adequately maintained and inspections identify areas that require maintenance.

Plant Pollution Prevention

The facility has an adequate pollution prevention plan outlined in its SWPPP.

Violations:

- None

This letter provides a record of the June 16, 2021 Compliance Evaluation Inspection.

The Division would like to thank Mr. Scott Lane and Ms. Jennifer Sylvester for their time and assistance. If you have any questions concerning either our inspection or this report, please contact Mr. Bascom at (423) 585-7879.

Sincerely,

Jennifer Innes

Jennifer Innes
Program Manager
Division of Water Resources

cc: Michael Bascom, TDEC DWR