

July 19, 2021

Mr. Jacob Nutt  
Tennessee Department of Environment and Conservation  
Division of Water Resources  
312 Rosa L. Parks Avenue, 11<sup>th</sup> Floor  
Nashville, TN 37243

RE: Arcosa Marine Products, Inc.  
1050 Trinity Road, Ashland City, TN 37015  
TMSP Compliance Inspection

Dear Mr. Robert Karesh,

Arcosa Marine Products, Inc. (Arcosa) is in receipt of a Tennessee Multi-Sector General NPDES permit (TMSP) Compliance Inspection Report regarding a Compliance Evaluation Inspection which occurred on June 30, 2021 at the Arcosa facility located at 1050 Trinity Road, Ashland City, TN 37015. Arcosa is covered under the NPDES Permit No. TNR051364. This letter is in response to the TDEC Division of Water Resources Compliance Inspection Report. This letter will include the alleged findings and the corrective action plan Arcosa has created moving forward to ensure that all best management practices are followed for regulatory compliance.

### **Alleged Findings**

1. Improper storage of waste materials in several locations throughout the site. Drums of waste materials were exposed to stormwater and found without lids, bungs or their exteriors wiped clean.

#### **RESPONSE:**

- I. All materials including grease and used steel shot discussed during the inspection have been cleaned, covered, or removed.
  - II. Moving forward all materials such as the steel shot at the Wheelabrator and the grease at the launch beams will be inspected daily by the crews that work with them to ensure proper housekeeping.
  - III. All employees throughout the plant will be given a refresher training on storm water pollution prevention and proper storage of product to ensure proper best management practices are followed and that the process of keeping the plant and stormwater clean is fully understood. This training will be complete by 8-13-2021
2. Waste material spillage throughout the Wheel-a-Brator area. The area was exposed to stormwater and without controls to prevent or minimize pollutant migration.

#### **RESPONSE:**

- I. Moving forward all materials in work areas will be inspected daily by the respective personnel.
- II. Additional Best Management Practices (BMPs) will be added to the SWPPP to address the housekeeping and importance of proper storage and how it relates to stormwater. This will be completed by 8-09-2021.
- III. Revisions to the daily department paperwork to ensure best management practices are being followed by 8-12-2021.

- IV. **Conduct Storm Water Refresher Training with department personnel to ensure proper protocols and procedures for regulatory compliance. BMPs will be reviewed to minimize the risk of stormwater contamination exposure. This will be completed by 8-13-2021.**
3. Marine grease spillage in the tipping beam and adjacent riverbank areas. These areas were exposed to stormwater and without controls to prevent or minimize pollutant migration.

**RESPONSE:**

- I. **The grease found at the tipping beams will be cleaned up by 7-30-2021.**
  - II. **Installation of catch basin to collect the grease spilled during the barge launching process by 8-10-2021.**
  - III. **Create new Standards of Operations for the launch area. Add routine inspections and clean up protocols to maintain Storm Water compliance. Make this a best management practice and standard procedure. This will be complete by 8-02-2021.**
  - IV. **Revise SWPPP BMPs with additional launch way protocols by 8-03-2021.**
4. Several areas associated with industrial activity had unstable road surfaces resulting in the generation of sediment and fines. These areas were exposed to stormwater and without controls to prevent or minimize pollutant migration.

**RESPONSE:**


- I. **Installation of Drain filters/Catch Basins to minimize the risk of sediment collection in the drainage system.**
  - II. **The filters have been received.**
  - III. **Drain filters will be installed by 8-06-2021.**
5. The Wheel-a-Brator and HazMat storage areas drain to an outfall located to the north of the facility's rail spur. The outfall was not identified in the facility's SWPPP and had not been previously inspected for stormwater discharge quality.

**RESPONSE:**

- I. **The Outfall located on the north side of the rail spur will be identified and labeled. All required SWPPP and Storm Water documentation will be updated to reflect additional outfall. It will be completed by 8-13-2021.**
- II. **Added Outfall No.5 to monthly and quarterly inspection.**

Arcosa looks forward to a response from TDEC Division of Water Resources regarding closure of this matter.

Sincerely,  
Arcosa Marine Products, Inc.

  
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David Johnson  
Plant Manager