



Appalachian Environmental Resources, Inc.
395 Steel Street
Johnson City, TN 37601-2894
Phone: 423-434-2985
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September 20, 2016

Mr. Bryan Carter
Tennessee Department of Environmental
and Conservation
Division of Water Resources
2305 Silverdale Road
Johnson City, TN 37601

RE: Compliance Evaluation Inspection
EnviraGlass response letter
NPDES Permit TN0081582

Dear Mr. Carter,

This letter has been prepared in response to the Compliance Evaluation Inspection (CEI) that was issued to EnviraGlass, LLC ("EnviraGlass") facility by the Tennessee Division of Water Resources ("Division") on or about August 9, 2016 and was received on August 11, 2016. This response letter includes the area of concern, a description of corrective action, and proposed completion date for each finding. EnviraGlass is complying with the requirements set forth in NPDES permit TN0081582 that details Sector E requirements for compliance.

The information below addresses each section of the CEI to allow the Division a better understanding of current and previous facility operations.

I: Permit:

The Division requests clarification of the types of glass to be tempered and the production rate associated with each type.

Facility Response:

EnviraGlass will be tempering solar glass used for industry. The glass produced and tempered at the facility will be used for solar panel applications.

II: Records/Reports:

The facility submitted discharge monitoring reports (DMR) each month and continues to file reports to the Division.

Facility Response:

EnviraGlass has been submitting discharge monitoring reports (DMR) since facility operations began in October 2014. Currently, monthly DMRs are being filed with the Division using NetDMR software. EnviraGlass will continue to file



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DMRs monthly as required. Once facility operations resume, a notification will be prepared and submitted to the Division that addresses production startup along with anticipated discharge under NPDES permit TN0081582.

III: Facility Site Review, Self-Compliance Program, and Operations & Maintenance

The facility was closed at the time of the inspection.

Facility Response:

The EnviraGlass facility is currently for sale. Discussions with facility management along with potential investors is being done. A proposed date for startup cannot be identified at this time.

IV: Effluent/Receiving Waters:

The receiving waters from outfall 001, SW1 and SW2 at the EnviraGlass property could not be reviewed during the site visit due to facility closure.

Facility Response:

Due to facility closure, a tour of the outfalls listed in NPDES permit TN0081582 could not be observed.

V: Flow Measurement:

Flow meter equipment could not be reviewed at the time of the inspection due to facility closure.

Facility Response:

EnviraGlass uses flow proportion information detailed in the Isco Open Channel Flow Measurement Handbook to verify discharge from the facility.

VI: Laboratory:

According to NPDES permit requirements, site-specific standard operation procedures (SOPs) detailing sample collection and handling, laboratory analysis, and laboratory QA/QC procedures, must be developed and implemented as necessary before discharge occurs.

Facility Response:

Procedures for sample collection and detailed information required for 40 CFR 136 have been developed and maintained at the facility.



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VII: Sludge Handling/Disposal:

NPDES permit TN0085182 contains requirements for disposal of sludge or other material removed by any treatment works.

Facility Response:

The settling pond that serves internal monitoring point (IMP) 01A was cleaned in 2015 of the sludge. Due to the short period of flat glass manufacturing, the settling pond did not exceed capacity allowing discharge flow from IMP 01A.

VIII: Pollution Prevention and Storm Water:

The Storm Water Pollution Prevention Plan (SWPPP) could not be reviewed due to facility closure. Upon review of the facility grounds from a distance, it was noted that piles of cullet and trash was located outside the facility. There are barriers in place around the piles but do not appear to be effective in keeping the material in place.

Facility Response:

The storage of cullet, batch material, and trash has been done at the facility for several years. The material is occasionally shipped offsite to a local landfill. Once operations resume, a plan for reducing the amount of material will be implemented.

EnviraGlass has prepared this submittal in regards to the CEI report that was submitted by the Division. Due to insufficient operating capital, EnviraGlass has not been able to announce a reopening of the facility. All permits and required reports are being completed as required according to operating permits.

EnviraGlass has not made immediate plans to reopen the facility. Once the plans are made to reopen or permanently terminate operations at the Kingsport facility, the Division will be notified by phone or email.



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Appalachian Environmental Resources, Inc. has been retained to oversee environmental operations at the EnviraGlass facility. If you have any questions, please contact Michael Fox at 423-956-2900 or myself at 423-408-2030.

Sincerely,

Allen Clark
Plant Manager
EnviraGlass, LLC

Cc: M. Fox/AER