



STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
CHATTANOOGA ENVIRONMENTAL FIELD OFFICE
1301 RIVERFRONT PARKWAY, SUITE 206
CHATTANOOGA, TENNESSEE 37402
PHONE (423) 634-5745 STATEWIDE 1-888-891-8332 FAX (423) 634-6389

March 19, 2021

Mr. Michael Lauth
A & B Eagle Line Equipment, Inc.
2315 US Hwy 11 S
Sweetwater, TN 37874
e-copy: michael@ab-eagleline.com

Certified Mail Receipt
7019 0160 0000 7191 5850

Subject: **Notice of Violation**
Compliance Evaluation Inspection
A & B Eagle Line Equipment, Inc.
NPDES Permit Number: TNR054361
2315 US Hwy 11 S
Sweetwater, McMinn County, Tennessee

Dear Mr. Lauth:

On March 17, 2021, Ms. Nikki Carpenter of the Division of Water Resources (Division) performed a Compliance Evaluation Inspection (CEI) for the above referenced facility. The purpose of the inspection was to evaluate A & B Eagle Line Equipment's compliance with the terms and conditions of the NPDES Permit Number TNR054361. You were present and provided information during the inspection.

Permit Verification

The facility is authorized to discharge industrial stormwater to Sweetwater Creek under the Tennessee Multisector General Permit for Industrial Activities (TMSP), covered under permit number TNR054361 Sector P *Stormwater Discharges Associated With Industrial Activity From Motor Freight Transportation Facilities, Passenger Transportation Facilities, Petroleum Bulk Oil Stations and Terminals, Rail Transportation Facilities, and United States Postal Service Transportation*, and Sector AB *Stormwater Discharges Associated With Industrial Activity From Facilities That Manufacture Transportation Equipment, Industrial, or Commercial Machinery*, SIC Code 3523. Coverage under Sector AB, SIC Code 3523, regulates stormwater discharges

from Farm Machinery and Equipment. NPDES Permit Number TNR054361 became effective on June 25, 2015 and expires on June 30, 2022.

Records and Reports

A site-specific Stormwater Pollution Prevention Plan (SWPPP) has not been developed for the site. The Division recommends that you contact TDEC's Office of External Affairs – Small Business Environmental Assistance Program for SWPPP development. Quarterly Visual Examinations and Comprehensive Site Compliance Evaluations have not been conducted.

Facility Site Review

A & B Eagle Line Equipment, Inc. is a facility that manufactures, repairs, and sells farm equipment, with approximately 10 employees. Vehicles are serviced under cover, in the facility plant, and there is no fueling station. There is a considerable amount of raw metal stored outside and several empty paint barrels, with lids, that are scheduled to be removed from site. There is a dumpster and scrap dumpster, both of which are tidy. Stormwater is discharged from the site after flowing across several hundred feet of grass to the northeast corner of the site before entering Sweetwater Creek. Discharge consists of sheet flow runoff from its building, gravel parking lot, and grassy swale behind plant.

Effluent/Receiving Stream

The outfall was observed during the inspection and no evidence of pollution was noted. The receiving stream is east of the site beyond the facility's fence.

Self-Monitoring Program

Quarterly visual inspections have not been completed in accordance with the permit. Sector AB, SIC code 3523 requires annual stormwater monitoring of Total Suspended Solids and Oil & Grease. Samples are evaluated by AIRL, Inc. in Cleveland. No exceedances occurred in 2020, 2019, or 2017. There was an exceedance of TSS in 2016 (170 mg/L). Monitoring was not conducted in 2018. Annual comprehensive site evaluations of the facility were not documented.

Operation and Maintenance

Housekeeping at the facility is good and appears to be well maintained. Good housekeeping practices reduce the potential for significant materials to come in contact with stormwater. No trash, debris, or indication of pollution was observed near the outfall.

Violations:

- No SWPPP has been developed or implemented as required by the permit.
- Quarterly Visual Examinations have not been conducted or documented as required by the permit.
- Comprehensive Site Compliance Evaluations/Inspections have not been conducted or documented as required by the permit.
- Analytical Monitoring Reports have not been consistently submitted to the Division as required by the permit.

Required Actions:

1. Submit a written response to the Division detailing the steps that will be taken to address the violations listed above. The response should be submitted to the Chattanooga Field Office no later than April 5, 2021.
2. Develop and implement a Stormwater Pollution Prevention Plan (SWPPP) for the facility and submit a copy to the Chattanooga Field Office within 6 months. The SWPPP should be received by the Division no later than September 30, 2021. The SWPPP should be kept on-site and contain documentation of all items required by the permit.

As discussed, TDEC's Office of External Affairs offers SWPPP development assistance to small businesses at no charge. Please see contact below:

Crystal Warren
Crystal.Warren@tn.gov
#901-371-3164

3. Quarterly Visual Examinations of the outfall area should begin immediately, and documentation should be kept on site for future inspections. Examinations should be conducted regularly as specified by section 5.3 of the permit.
4. Annual analytical monitoring results for each outfall should be submitted to the Division as specified by section 5.2 of the permit.

This letter provides a record of the March 17, 2021 Compliance Evaluation Inspection. The Division would like to thank you for your time and assistance during our inspection. If you have any questions concerning either our inspection or this report, please contact Ms. Nikki Carpenter at (423) 661-5267 or by e-mail at Nikki.Carpenter@tn.gov.

Sincerely,

A handwritten signature in blue ink that reads "Jennifer Innes".

Jennifer Innes
Environmental Program Manager
Division of Water Resources
Chattanooga Environmental Field Office

A & B Eagle Line Equipment, Inc.
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Photo 1.

Southwestern
corner of site.



Photo 2.

Facing east across
site; stormwater
flows east and
north to
Sweetwater Creek.



A & B Eagle Line Equipment, Inc.
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Photo 3.

Facing north
towards plant,
shed, and office.



Photo 4.

Storage outside
plant.



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Photo 5.

Storage behind
plant in western
portion of site.



Photo 6.

Empty paint
containers in rear
of facility.



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Photo 7.

Path of stormwater flow behind plant along northern boundary of site.



Photo 8.

Facing outfall point in northeast corner of site.

