



June 22, 2018

Mr. Bryan Carter  
Environmental Protection Specialist  
Division of Water Resources  
Johnson City Environmental Field Office  
2305 Silverdale Drive  
Johnson City, TN 37601

Subject: Corrective Action Plan  
1450 Lincoln Street  
Kingsport, Tennessee

Dear Mr. Carter,

In regards to the Compliance Evaluation Inspection (CEI) report of May, 29, 2018 we have prepared the following Corrective Action Plan as requested.

Facility Status: The current status of the facility is non-production storage/warehouse. The property has not operated as a production plant since Envira Glass operations defaulted on their lease in October 2015. Currently the warehouse space is being leased to Eastman Chemical which have used the facility for storage of pipe insulation.

Deficiency in Facility Permitting:

1. NPDES Permit TN0081582 (Attachment A) filed by Heritage Glass effective August 1, 2014 and to expire June 30, 2019. Kingsport Industrial Development Board (KIDB) does not wish to keep the permit active. As the operation have ceased in glass production there would be no need for us to retain or transfer the Permit. Appalachian Environmental Resources, Inc. still continue to monitor the outfall.
2. The discrepancy of the type of glass produced at the facility from 2013 Permit. We cannot attest to the type of glass produced by prior owner Heritage/Envira Glass.
3. Clarification regarding what flows are still discharging via outfall 001. Since no production process has been performed at the facility since 2015 the flows are a combination of ground water and storm water runoff.

Pollution Prevention and Storm Water:

1. Presence of cullet and scrap piles. Due the current status of the facility the cullet piles no longer need to remain onsite and we will be removing all cullet stock piles from the property. This action will eliminate possible discharge of pollutants in stormwater runoff. We will be disposing of the scrap material piles along on the north side of site near Lincoln Street to Kingsport C & D Landfill. This action will provide good housekeeping for the site. Cullet and scrap site cleanup will be complete by March 2019.

2. The original SWPPP, which was filed by Heritage/Envira Glass would not reflect the current use of the facility. KIDB has not filed a SWPPP due to the inactive plant status.
3. We cannot attest to the identity or lack of identity of the pollution prevention team members of the existing SWPPP filed by the previous owners.
4. Non stormwater discharge not included in original SWPPP filed by Heritage Glass, LLC. We cannot attest to Heritage Glass, LLC evaluation and certification during their operations which ceased in 2015
5. Incomplete NPDES TN0081582. This permit filed by Heritage Glass, LLC cannot be signed by an official of the City of Kingsport and/or KIDB since we are a separate entity from Heritage Glass. The permit was not revised to update permittee name due to the recommendation by TDEC that it would be sufficient to update TDEC records until the permit is due for renewal in June 2019 as shown in Attachment B Email Correspondence with Mr. Michael Fox of Appalachian Environmental Resources, Inc. and Mrs. Maybelle Sparks of TDEC Nashville Office.
6. Deteriorated chemical drums stored outside, cullet and other materials also stored outside with little containment. All deteriorated drums will be removed from outdoor storage, properly sealed and contained. All cullet and scrap to be removed from site as included in correction action number 1 as noted above. Good housekeeping measures will be taken in the warehouse areas such as general clean up. We will begin reduction of the finished glass inventory. We expect the inventory to be removed by July 2019.

We plan on immediate implementation of the Corrective Action Plan as described above. We want to be very diligent to protect the water quality in our community and ultimately the state. We wish to work with TDEC in this effort. If I can provide further information or if you have any questions or concerns please contact me at (423) 863-0462 or via email.

[DawnMelton@KingsportTN.gov](mailto:DawnMelton@KingsportTN.gov).

Sincerely,



Dawn Melton  
Senior Project Manager  
**City of Kingsport Engineering**  
Office: 423-343-9792  
Mobile: 423-863-0462

Attachments: A & B

**Attachment A:**



**No. TN0081582**

Authorization to discharge under the  
National Pollutant Discharge Elimination System (NPDES)

Issued By

**STATE OF TENNESSEE  
DEPARTMENT OF ENVIRONMENT AND CONSERVATION  
DIVISION OF WATER RESOURCES  
William R. Snodgrass - Tennessee Tower  
312 Rosa L. Parks Avenue, 11<sup>th</sup> Floor  
Nashville, Tennessee 37243-1102**

Under authority of the Tennessee Water Quality Control Act of 1977 (T.C.A. 69-3-101 et seq.) and the delegation of authority from the United States Environmental Protection Agency under the Federal Water Pollution Control Act, as amended by the Clean Water Act of 1977 (33 U.S.C. 1251, et seq.)

Discharger: **Heritage Glass, LLC**

is authorized to discharge: **filter backwash, non-contact cooling water, storm water, glass washing wastewater and glass edger wastewater through Outfall 001 and industrial stormwater runoff from Outfalls SW1 and SW2**

from a facility located: **in Kingsport, Sullivan County, Tennessee**

to receiving waters named: **South Fork Holston River and an unnamed tributary (historically referred to as AFG Stream) to Madd Branch**

in accordance with effluent limitations, monitoring requirements and other conditions set forth herein.

This permit shall become effective on: **August 1, 2014**

This permit shall expire on: **June 30, 2019**

Issuance date: **July 1, 2014**

A handwritten signature in cursive script, appearing to read "S. Dudley", is written over a horizontal line.

for Sandra K. Dudley, Ph.D., P.E.  
Director

**Attachment B:**

**From:** Michael Fox <mfox@aertn.com>  
**Sent:** Saturday, July 16, 2016 2:06 PM  
**To:** Maybelle Sparks  
**Cc:** Bryan Carter  
**Subject:** RE: Heritage Glass, LLC-NPDES TN0081582

Mrs. Sparks,

For this, I think updating TDEC records would be sufficient until the permit is due for renewal.

Let me know if you have any questions.

Thanks,  
Mike

**From:** Maybelle Sparks [<mailto:Maybelle.Sparks@tn.gov>]  
**Sent:** Friday, July 15, 2016 2:31 PM  
**To:** Michael Fox <[mfox@aertn.com](mailto:mfox@aertn.com)>  
**Cc:** Bryan Carter <[Bryan.Carter@tn.gov](mailto:Bryan.Carter@tn.gov)>  
**Subject:** RE: Heritage Glass, LLC-NPDES TN0081582

Mr. Fox,  
Thank you for the detailed explanation. Do you want a revised permit with the updated permittee name or is updating our records sufficient until the permit is up for renewal in June 2019?  
Thanks!



Maybelle Sparks | Environmental Protection Specialist  
Division of Water Resources  
William R. Snodgrass Tennessee Tower  
312 Rosa L. Parks Avenue, 11th Floor  
Nashville, Tennessee 37243  
Office: 615-532-0651  
Fax: 615-532-0686  
[Maybelle.Sparks@tn.gov](mailto:Maybelle.Sparks@tn.gov)  
[tn.gov/environment](http://tn.gov/environment)

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**From:** Michael Fox [<mailto:mfox@aertn.com>]  
**Sent:** Wednesday, July 13, 2016 8:05 AM  
**To:** Maybelle Sparks  
**Subject:** RE: Heritage Glass, LLC-NPDES TN0081582

**\*\*\* This is an EXTERNAL email. Please exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email - STS-Security. \*\*\***

Mrs. Sparks,

Good morning. The property is now owned by the City of Kingsport Economic Development Board. This transition is about 30 days old so I assume the paperwork is still being transferred.

EnviraGlass has bought out Heritage Glass and began the new ownership on May 27, 2016. EnviraGlass will be leasing the property from the City of Kingsport.

Let me know if you have any more questions.

Thanks,

Michael W. Fox  
Director-EHS Compliance Services  
Appalachian Environmental Resources, Inc.  
395 Steel Street  
Johnson City, TN 37601  
O: 423-434-2985  
C: 423-956-2900

**From:** Maybelle Sparks [<mailto:Maybelle.Sparks@tn.gov>]  
**Sent:** Tuesday, July 12, 2016 10:30 AM  
**To:** Michael Fox <[mfox@aertn.com](mailto:mfox@aertn.com)>  
**Subject:** Heritage Glass, LLC-NPDES TN0081582

Mr. Fox,

We have received your application for transfer of ownership and have a question.

According to the TN tax assessor's website, the property is owned by AGC FLAT GLASS N AMERICA in Alpharetta, GA. Also, EnviraGlass, LLC is a company with a business address in Davidson County, TN. What is EnviraGlass's relationship with these companies?

Thanks!  
Maybelle



Maybelle Sparks | Environmental Protection Specialist  
Division of Water Resources  
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[tn.gov/environment](http://tn.gov/environment)