



# TENNESSEE CHAMBER of Commerce & Industry

TENNESSEE MANUFACTURERS ASSOCIATION

August 6, 2021

Division of Water Resources  
Tennessee Department of Environment and Conservation  
Attention: Vojin Janjic  
William R. Snodgrass Tennessee Tower  
312 Rosa L. Parks Avenue  
Nashville, Tennessee 37243

**VIA ELECTRONIC MAIL**

vojin.janjic@tn.gov

**Re: Comments to Proposed NPDES Permit for Discharges of Stormwater Related to Construction Activity.**

Dear Mr. Janjic,

On behalf of the Tennessee Chamber of Commerce and Industry (the “Chamber”) we are submitting the following comments to the Tennessee Department of Environment and Conservation (“TDEC” or the “Department”) regarding proposed NPDES permit for discharges of stormwater related to construction activity.

The Chamber serves as the primary voice of diverse business and manufacturing trade interests on major employment, economic and environmental issues facing public policy decision-makers in Tennessee. We also work to foster harmonious relationships between the various elements of the Tennessee business community and to serve as an umbrella organization for companies, trade associations and chambers of commerce to work together for the economic health of the state. The Chamber’s members operate both large and small businesses throughout Tennessee and in this capacity, the Chamber represents a large and diverse portion of the regulated community that will be affected by permits related to water quality in Tennessee.

The Chamber believes strongly in the importance of protecting the natural environment, including water quality, but doing so in a manner that appropriately balances the many facets of environmental regulation. The Chamber appreciates the opportunity to provide the comments presented below to TDEC. The Chamber would be happy to discuss any of these comments with TDEC as the Department moves ahead with efforts to finalize this permit.

## **Comments:**

The Chamber appreciates and is supportive of the changes proposed in the revised NPDES permit for discharges of stormwater for construction related activities. In particular, the Chamber agrees that

removing the prohibition on conducting more than 50 acres of disturbance at one time under CGP coverage is appropriate given that the individual permit process costs applicants time and resources and the additional requirements have not shown to improve water quality. In the same vein, the Chamber agrees that the site inspection frequency should be revised to not exceed the federal minimum requirement. If there is no known evidence that adhering to the federal standard has caused pollution or increased pollutant discharges, as outlined in the permit rational, then no justification exists for twice-weekly inspections and, thus, the requirement should be revised.

Again, thank you for the opportunity to provide comments on this revised permit. Please do not hesitate to contact me at 573-424-7267 or by email at [Mallorie.Kerby@tnchamber.org](mailto:Mallorie.Kerby@tnchamber.org).

A handwritten signature in black ink that reads "Mallorie Kerby". The signature is written in a cursive, flowing style.

Mallorie Kerby  
Associate Vice President for Environment & Energy  
Tennessee Chamber of Commerce & Industry  
Tennessee Manufacturing Association