



**STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
NASHVILLE ENVIRONMENTAL FIELD OFFICE
DIVISION OF WATER RESOURCES
711 R.S. GASS BOULEVARD
NASHVILLE, TN 37243
PHONE 615-687-7000 STATEWIDE 1-888-891-8332 FAX 615-687-7078**

June 8, 2020

Tarun Surti
5928 Westheimer Drive
Brentwood, TN 37204
ecopy: tarunsurti@comcast.net

Subject: Notice of Violation
 Aloft Hotels
 608 McGavock Pike
 Nashville, Davidson County, TN
 TNR240679

Dear Mr. Surti:

On June 4, 2020, the Division of Water Resources (the Division) made a compliance evaluation inspection (CEI) at the Aloft Hotel construction site located at 608 McGavock Pike Davidson County, Nashville, TN. During the inspection, Division staff inspected the site's stormwater pollution prevention plan (SWPPP), erosion prevention sediment controls (EPSCs), inspection reports and best management practices (BMPs) for compliance with the Construction General Permit (CGP).

During the CEI, the Division found the following violations:

- 1) EPSC's were missing on the north end of the site protecting the water feature from the disturbed area;
- 2) The inspector for the site performing the required twice weekly inspections was listed as John Dennis. There is no record that Mr. Dennis has a valid certification from the "Fundamentals of Erosion Prevention and Sediment Control Level I" course as required by CGP Section 3.5.8.1(a);

Mr. Tarun Surti

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- 3) The SWPP for the site identified a wetlands buffer to the south. Construction was observed in this area, but it could not be determined during the site inspection if the wetlands buffer has been violated.

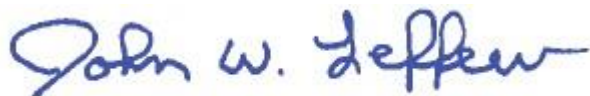
In order to begin bringing this site into compliance, you must complete the following by **June 22, 2020**:

- 1) Install EPSCs along the north end of the site to protect the water feature and provide photo documentation;
- 2) Provide documentation that the inspector of the site has completed the "Fundamentals of Erosion Prevention and Sediment Control Level I or meets the other requirements listed in Section 3.5.8.1 in the CGP;
- 3) Provide a site plan showing the extent of the disturbance in the south end of the property in relation to the required wetlands buffer. The plan must be certified by Tennessee Professional Engineer.

Note that the site has coverage under ARAP NRS16.124. There are possible violations as well under this permit, so documentation has been sent to the permit writer for further evaluation.

Your prompt attention to these matters is greatly appreciated. If you have any questions regarding this matter, please contact me at 615-687-7106 or John.Leffew@tn.gov.

Sincerely,



John W. Leffew, P.G.
Division of Water Resources

Cc:

Bill Murph, TDEC-DWR, Bill.Murph@tn.gov

Tim Jennette, TDEC-DWR, Tim.Jennette@tn.gov

Michael Hunt, Metro Water Services, Michael.Hunt@nashville.gov

James Edwards, Superintendent, JAFielden, jamese@jafielden.com

Joshua Dennis, Assistant Superintendent, joshuad@jafielden.com

Attachment



TENNESSEE DEPARTMENT OF ENVIRONMENT AND CONSERVATION

Division of Water Resources

William R. Snodgrass Tennessee Tower, 312 Rosa L. Parks Avenue, 11th Floor, Nashville TN 37243
1-888-891-8332 (TDEC)

Compliance Inspection for General NPDES Permit for Stormwater Discharges from Construction Activities (CGP)

Site/Project Name:	Aloft Hotel	NPDES Tracking Number:	TNR240679
Street Address or Location:	608 McGavock Pike	Date Coverage was issued:	26-Oct-16
Site Description:	Hotel development	Start Date:	1-Aug-16
County(ies): Davidson	EFO: Nashville	Estimated End Date:	31-Dec-17
	MS4 Jurisdiction: TNS068047	Latitude (dd.ddd):	36.1547
		Longitude (-dd.ddd):	-86.6825
		Acres Disturbed:	3.8
		Total Acres:	

Name of Permittee (Developer/Operator):	608 Hotels, LLC		
Name of Official Contact: Tarun Surti	Email: tarunsurti@comcast.net	Contact Phone: 615-812-6164	
Address: 5928 Westheimer Drive	City: Brentwood	State: TN	Zip: 37204

Construction Phase: Site preparation Grading Construction Final Stabilization

Inspection Purpose: Routine Follow-up Complaint NOT

	Yes	No	Comments
Have all construction activities stopped and 70% uniform permanent cover established?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Notable impacts to waters as a result of site activities/discharges?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Evidence of insufficiently treated stormwater discharges at outfall locations?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Evidence of structural EPSC measure failure/absence?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Evidence of non-structural EPSC measure failure/absence?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Unauthorized discharges?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Evidence of offsite impacts?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Evidence of construction buffer disturbance?	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	ARAP
Compliance Evaluation: Any Y = recommend NOV/EAR or follow-up - date: _____ Any Y = recommend follow-up (email, letter, inspection, etc.) - date: _____			

	Yes	No	Comments
Are copies of the SWPPP & inspection reports on site or made available?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Has SWPPP been implemented & satisfactory?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Are 2/week inspections being performed?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Are inspection reports completed & signed?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Are inspection reports filled out by a qualified EPSC inspector?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	John Dennis
Compliance Evaluation: Any N = recommend follow-up (email, letter, inspection, etc.) date: _____			

	Yes	No	Comments
Are there ARAP violations or unauthorized stream/wetland alteration?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	NR 16.124
Compliance Evaluation: Y = perform follow-up ARAP inspection - date: _____			

Notes: See Page 2

On-Site Contact (If available)	On-Site Contact Name (Print):	On-Site Contact Title:	Signature:	Date:
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TDEC Personnel/Information	Inspector's Name (Print): John W. Leffew	Signature: <i>John W. Leffew</i>	Date: 6/4/2020 Time: 1:00	EFO: Nashville EFO 711 R.S. Gass Boulevard Nashville, TN 37216
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EPSC measures missing on N side of site along water feature. Sediment observed leaving the site through the N side where the EPSC's are missing. A rain event just occurred prior to the inspection. Water in the channel was very turbid and brown, but the same conditions were observed upstream. Work on ARAP NRS 16.124 was in process. Wetlands ^{buffer} ~~area~~ to the South may have been violated.

Site: Aloft Hotels
Permit ID: TNR240679
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Photo 1: View of site from Lakeland Dr. looking west.

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Photo 2: View of ARAP NRS16.124 construction area.

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Photo 3: View of NRS16.124 construction area.

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Photo 4: View of ARAP NRS16.124 construction area looking south.

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Photo 5: View of ARAP NRS16.124 construction area.

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Photo 6: North end of site. Note that the feature is not protected from the disturbed area by EPSCs

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Photo 7: View of feature looking south.

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Photo 8: View of south end of site. Wetlands buffer is in this area.

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Photo 9: View looking west.