



STATE OF TENNESSEE  
**DEPARTMENT OF ENVIRONMENT AND CONSERVATION**  
**DIVISION OF WATER RESOURCES**

Memphis Environmental Field Office  
8383 Wolf Lake Drive  
Bartlett, TN 38133  
Phone 901-371-3000 Statewide 1-888-891-8332 Fax 901-371-3170

August 18, 2016

Mr. William Hancock, Jr.  
Alston Construction Company  
35 Music Square East, Suite 301  
Nashville, TN 37203

Subject: Compliance Evaluation Inspection (CEI)  
NPDES Permit No. TN0081809  
Gateway Global Logistics Center  
Rossville, Fayette County, Tennessee

Dear Mr. Hancock:

Personnel from the Tennessee Department of Environment and Conservation (TDEC), Division of Water Resources (DWR), Memphis Environmental Field Office are tasked with conducting Compliance Evaluation Inspections (CEI) for facilities that have obtained coverage under the National Pollutant Discharge Elimination System (NPDES) permit. Therefore, on Wednesday, August 3, 2016, DWR personnel met with Bruce Yancey (Yancey Brothers Construction, LLC) and Cara Martin (Pickering Firm, Inc.) to conduct a Compliance Evaluation Inspection (CEI) of construction activities occurring at the Gateway Global Logistics Center (GGL) site. DWR personnel conducted a similar inspection on May 24, 2016, and the site was determined to be in compliance at that time. However, since land disturbing activities have changed significantly since the May inspection, a second inspection was deemed necessary by DWR. As during the first inspection, DWR personnel greatly appreciated the assistance and cooperation of all parties involved with the second inspection. Below is a summary of the findings from this inspection.

The entire site had been cleared of vegetation, and construction of the warehouse was underway. A section of the site associated with the building had already been soil cemented, and construction site personnel were observed continuing the soil cementing process in anticipation of further construction of the building. On August 1, 2016, Mr. Yancey of Yancey Brothers Construction, LLC, notified DWR that approximately 45 acres of disturbance had been stabilized with concrete, soil cement, or vegetation, thereby reducing the total amount of disturbance to less than 50 acres. On August 12, 2016, GGL personnel submitted a letter requesting to terminate coverage under the individual permit and resume coverage under the Construction General Permit (CGP) under TNR154169. DWR personnel informed GGL personnel that termination of the individual permit must be public noticed for 30 days prior to termination. DWR will public notice the termination on August 22, 2016. The terms and conditions of the individual permit should be followed until the individual permit has been officially terminated.

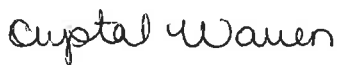
All four of the proposed sediment basins had been installed, although only sediment basin #2 had been sufficiently vegetated (see photos 1 – 3 of the enclosed photo document). Rills and gullies were observed on the banks of sediment basin #1. Please remember that the banks of the sediment basins should be stabilized as soon as possible and within 14 days of activity ceasing in that area and that rill and gully formation should be prevented. Although the diversion ditch had been mostly installed, it had not yet been completed by connecting to sediment basin #4 and was functioning as an additional sediment basin. The portion of the diversion ditch on the south side of the site had been seeded recently, and sprigs of early grass growth were observed. Mr. Yancey explained that sediment basins #1 – 3 had been flocculated four days prior to the inspection; however, an unexpected rain event followed immediately after flocculation. Therefore, the basins had to be flocculated again prior to dewatering. Also, water in the diversion ditch will be flocculated and pumped into sediment basin #4 for dewatering. According to Mr. Yancey, this dewatering event will be the first dewatering event, with the exception of sediment basin #3. Ms. Martin explained that stormwater collected in the basins and diversion ditch was infiltrating into the site's sandy soil, which is why the basins had not reached the dewatering elevation prior to the time of inspection. The receiving stream and Outfalls #2 and #3 were observed during the inspection. No surface water was observed in the receiving stream at the time of inspection, and DWR personnel saw no evidence of sediment discharge at the outfalls or in the stream (see photos 4 – 5). Additionally, the receiving lake for Outfalls #1 and #4 did not appear sediment-laden (see photo 6).

On Sunday, July 10, 2016, GGL personnel notified DWR via telephone and text messages of an accidental drowning and the need to immediately dewater sediment basin #3, although the pond had not been flocculated. GGL personnel installed sediment control measures down-gradient of the basin to capture sediment-laden runoff. Mr. Yancey and Ms. Martin stated they walked the receiving stream two days following the emergency release and observed little to no sediment discharge in the stream. GGL personnel sent a follow up email to DWR summarizing the events of emergency release on July 13, 2016, thereby following the terms and conditions of the individual permit. During the inspection, DWR personnel reminded GGL personnel to include information about the dewatering in their July DMRs.

DWR personnel reviews the site's Discharge Monitoring Reports (DMRs) when they are submitted to the MEFO, and it appears that all of the paperwork and monitoring requirements are in compliance with the terms and conditions of the individual permit.

The time and effort that site personnel have invested into ensuring this site stays in compliance with the individual permit is recognized and commended by DWR personnel. Please continue with the attention given thus far to the installation and maintenance of appropriate erosion prevention and sediment control measures on-site. Site personnel continue to be extremely cooperative with DWR throughout the permitting and inspection process. If you have any questions or concerns with regard to this permit, please contact me at 901-371-3164 or via email at [Crystal.Warren@tn.gov](mailto:Crystal.Warren@tn.gov).

Sincerely,




Crystal Warren  
Program Coordinator  
Division of Water Resources  
Memphis Environmental Field Office


Enclosure: ICIS form, Photo document

cc: TDEC/DWR/MEFO – file


## Photographic Log for Gateway Global Logistics Center

<b>Permittee Name:</b>		<b>Site Location:</b>	<b>Tracking No.:</b>
Gateway Global Logistics Center		0.5 miles south of Knox Road, south of proposed N. Industrial Road	TN0081809
<b>Photo No.</b>	<b>Date</b>		
1	8-3-16		
<p><b>Description</b>                  Sediment basin #2 was installed and vegetated (view NW). According to Gateway Global Logistics Center (GGL) personnel, the basin had been flocculated 4 days prior to the inspection. However, an unexpected rain event prevented dewatering of the basin. Therefore, the basin should be flocculated again prior to dewatering. The basin was not discharging at the time of inspection. The receiving stream is located in the tree line west of the basin (see photo 4).</p>			

## Photographic Log for Gateway Global Logistics Center


<b>Permittee Name:</b>		<b>Site Location:</b>	<b>Tracking No.:</b>
Gateway Global Logistics Center		0.5 miles south of Knox Road, south of proposed N. Industrial Road	TN0081809
<b>Photo No.</b>	<b>Date</b>		
2	8-3-16		
<p><b>Description</b></p> <p>Sediment basin #1 was installed but has not been vegetated (view NE). According to GGL personnel, the basin had been flocculated 4 days prior to the inspection. However, an unexpected rain event prevented dewatering of the basin. Therefore, the basin should be flocculated again prior to dewatering. The basin was not discharging at the time of inspection. Rills and gullies were observed on the banks of the basin. Please remember to stabilize the banks of the basin as soon as possible, and within 14 days from when activity ceases. The receiving lake is located in the tree line north of the pond (see photo 6).</p>			

## Photographic Log for Gateway Global Logistics Center


<b>Permittee Name:</b> Gateway Global Logistics Center		<b>Site Location:</b> 0.5 miles south of Knox Road, south of proposed N. Industrial Road	<b>Tracking No.:</b> TN0081809
<b>Photo No.</b> 3	<b>Date</b> 8-3-16		
<p><b>Description</b> Sediment basin #3 was installed, and sparse vegetation was observed (view SW). According to GGL personnel, the basin had been flocculated 4 days prior to the inspection. However, an unexpected rain event prevented dewatering of the basin. Therefore, the basin should be flocculated again prior to dewatering. The basin was not discharging at the time of inspection. This basin was dewatered prior to flocculation due to an on-site emergency on July 10, 2016. The receiving stream is within the tree line west of the pond (see photo 5).</p>			




## Photographic Log for Gateway Global Logistics Center

<b>Permittee Name:</b> Gateway Global Logistics Center		<b>Site Location:</b> 0.5 miles south of Knox Road, south of proposed N. Industrial Road	<b>Tracking No.:</b> TN0081809
<b>Photo No.</b> 4	<b>Date</b> 8-3-16		
<p><b>Description</b> Outfall SW2, the outfall for sediment basin #2 (see photo 1), located down-gradient of Outfall SW#3 and up-gradient of In-stream Monitoring Point #2, was observed. The sandy substrate showed no evidence of sediment discharge into the receiving stream. Surface water was not observed in the stream at the time of inspection; the direction of stream flow, when it occurs, is indicated by the red arrow.</p>			

## Photographic Log for Gateway Global Logistics Center

<b>Permittee Name:</b> Gateway Global Logistics Center		<b>Site Location:</b> 0.5 miles south of Knox Road, south of proposed N. Industrial Road	<b>Tracking No.:</b> TN0081809
<b>Photo No.</b> 5	<b>Date</b> 8-3-16	<div style="display: flex;"> <div style="flex: 1; padding-right: 10px;"> <p><b>Description</b> Outfall SW#3, the outfall for sediment basin #3 (see photo 3), located down-gradient of In-stream Monitoring Point #1 and up-gradient of Outfall SW#2, was observed. The sandy substrate showed no evidence of sediment discharge into the receiving stream, even though this basin was dewatered prior to flocculation due to an on-site emergency on July 10, 2016. Surface water was not observed in the stream at the time of inspection; the direction of stream flow, when it occurs, is indicated by the red arrow.</p> </div> <div style="flex: 2;">  </div> </div>	

## Photographic Log for Gateway Global Logistics Center

<b>Permittee Name:</b> Gateway Global Logistics Center		<b>Site Location:</b> 0.5 miles south of Knox Road, south of proposed N. Industrial Road	<b>Tracking No.:</b> TN0081809
<b>Photo No.</b> 6	<b>Date</b> 8-3-16		
<b>Description</b> The receiving lake for Outfalls SW#1 and SW#4 was observed (view N; see photo 2). There was no flow into the lake at the time of inspection, and the water in the lake did not appear sediment-laden. Direction of flow into the lake is indicated by the red arrow.			





TDEC - Division of Water Resources  
Memphis Field Office

ICIS NPDES Facilities Inspection Report

Facility Data

NPDES ID:  Facility Site Name:   
 Address:   
 Permit Eff. Date:  Permit Exp Date:  SIC Code:

Compliance Monitoring Information

Compliance Monitoring Activity Name:   
 \* If Bio Monitoring is selected above, select the method used:   
 Compliance Monitoring Activity:

Compliance Monitoring Dates/Times

Entry Date/Time (mm/dd/yyyy hh:mm):  Exit Date/Time (mm/dd/yyyy hh:mm):

Facility Representatives

On-Site Representative(s) Title, Phone Number:   
 Responsible Official(s), Title, Phone Number:

Statute and Section Information

Federal Statute:  State Statute:   
 Programs:   
 Compliance Monitoring Reason:   
 Compliance Monitoring Agency Type:  Agency Name:   
 Did EPA assist/ Inspection?  Time Physically conducting activity: Days:  Hours:   
 Inspection Type:  Compliance Monitoring Action Outcome:   
 Lead Agency:  Compliance Monitoring Rating Code:   
 If Joint Inspection, what was the purpose of the other party?

Areas Evaluated During Inspection (Check only those areas evaluated)

<input checked="" type="checkbox"/> Permit	<input type="checkbox"/> Self - Compliance Program	<input type="checkbox"/> Pretreatment
<input checked="" type="checkbox"/> Records / Records	<input type="checkbox"/> Compliance Schedule	<input checked="" type="checkbox"/> Pollution Prevention
<input type="checkbox"/> Facility Site Review	<input type="checkbox"/> Laboratory	<input checked="" type="checkbox"/> Storm Water
<input checked="" type="checkbox"/> Effluent / Receiving Waters	<input type="checkbox"/> Operations & Maintenance	<input type="checkbox"/> Combined Sewer Overflow
<input type="checkbox"/> Flow Measurement	<input type="checkbox"/> Sludge Handling / Disposal	<input type="checkbox"/> Sanitary Sewer Overflow

Compliance Monitoring Summary

EPA and State Representatives

<input type="text" value="Cynthia Wanner"/>	<input type="text" value="TDEC-DWR/MEFO/901-371-3164"/>	<input type="text" value="Aug 18, 2016"/>
Inspector's Signature	Agency / Office / Phone	Date
<input type="text" value="Jellyn Brazle"/>	<input type="text" value="TDEC-DWR/MEFO/901-371-3025"/>	<input type="text" value="Aug 18, 2016"/>
Manager's Signature	Agency / Office / Phone	Date

(Note: This form can only be printed to an XPS document, then saved for later use.)