



July 3, 2023

Tennessee Division of Water Resources  
Nashville Field Office  
711 R.S. Gass Blvd  
Nashville, TN 37216

ATTENTION: Tennessee Division of Water Resources

SUBJECT: Notice of Corrective Actions  
Foley Products Company, LLC – Franklin Plant  
213 Downs Boulevard  
Franklin, Williamson County, Tennessee 37064  
NPDES Permit No. TNG110406

To Whom It May Concern:

On behalf of Foley Products Company, LLC (Foley), Spectrum Environmental, Inc. (Spectrum) is pleased to provide this Notice of Corrective Actions to the State of Tennessee, Department of Environmental Conservation, Division of Water Resources (DWR) in response to the Notice of Exceedance to the Permit Limits submitted by Spectrum on April 27, 2023.

***BMP Installation and Maintenance***

Spectrum personnel mobilized to the site on June 29, 2023 for installation of stormwater management materials in and around stormwater inlets. Additionally, all inlets ultimately discharging to waters of Tennessee were cleaned and cleared of sediment on May 3, 2023. Plans are in place for cleaning to occur again in the next 90 days of the issuance of this letter. Photos of corrective actions have been included in Attachment A.

***Outfall SW-001***

Straw waddles were placed on contours around stormwater drainage paths to guide runoff waters towards SW-001. Failing and nonfunctioning straw waddles were removed and replaced in and around the area.

[www.specenviro.com](http://www.specenviro.com)

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Nashville, TN  
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*Outfall SW-002*

Straw waddles were placed along the northern side of concrete barriers, south of outfall SW-002. Straw waddles were placed upgradient relative to the inlet, before stormwater moves down the slope along the northern perimeter of the site.

*Outfall SW-003*

Outfall SW-003 is located on the western side of the site, near aggregate piles. Four to five layers of straw waddles were placed in between aggregate piles and SW-003 for a length of approximately 150 feet, north to south. Failing and nonfunctioning BMPs were removed and replaced while still functioning BMPs were left in place and reinforced with new material.

*Aggregate Piles*

Aggregate stockpiles, located to the south of the main fabrication facility, have been reduced in quantity in an attempt to limit the mixing of material with runoff water. Relocation of aggregate stockpiles is not feasible at this time, as other locations are not believed to be suitable and would require further BMP installation and monitoring. Multiple layers of straw waddles, as described above, is believed to be the most ideal practice for stopping and retaining sediment at the site.

Future plans for stormwater management include the following:

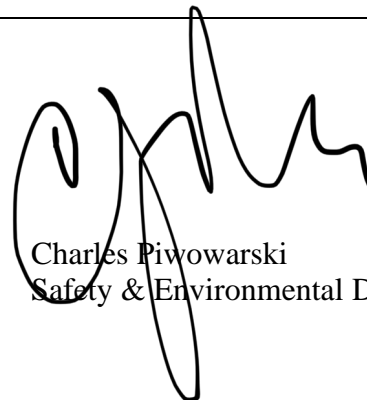
- Monitoring and replacement of BMPs around all inlets and outfalls as needed.
- Regular piping monitoring and cleanout on an as needed basis.
- Monitoring of aggregate stockpiles in quantity and location with adjustments being made as needed relative to observed interaction with surface waters runoff.
- Foley has contracted with a civil engineer to redesign the facility's stormwater drainage system. Foley will continue to pursue this this project. Upon completion of this project, modifications to the facility's SWPPP will be made as necessary.

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Sincerely,  
SPECTRUM ENVIRONMENTAL, INC.



Tyler Cantrell  
Staff Geologist



Charles Piwowarski  
Safety & Environmental Director



Ryan Cothorn, G.I.T  
Senior Staff Geologist

Attachment A



# Site Reconnaissance Photographs



Straw waddle installation near outfall 002



Straw waddle installation near outfall 002



Straw waddle installation near outfall 002



Straw waddle installation near outfall 001



# Site Reconnaissance Photographs



Straw waddle installation near outfall 001



Straw waddle installation near outfall 003



Straw waddle installation near outfall 003



Straw waddle installation near outfall 003