

August 5, 2021

Paul E. Davis, PE
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By email to Mr. Vojin Janjić _at Vojin.Janjic@tn.gov.

Re: General NPDES Permit for Storm Water Discharges Associated with Construction Activity
Permit Number: [TNR100000](#)

I've sent comments on July 8 and again on July 20. This comment is sent August 5, 2021, the announced last day of the extended comment period.

The draft permit now on notice will replace the present General NPDES Permit for Storm Water Discharges Associated with Construction Activity, which is set to expire on September 30, 2021. I know that TDEC needs to maintain a current general permit for construction activities. I know also that TDEC has received a number of comments that will need to be carefully considered before a new permit can issue.

In order to meet both of those objectives, I suggest that TDEC reissue the present General NPDES Permit for Storm Water Discharges Associated with Construction Activity for a period of one year.

The agency has precedent in issuing a short term extension. The [Tennessee Storm Water Multi-Sector General Permit for Industrial Activities \(MSGP\)](#) was reissued just over a year ago for a period two years to allow review EPA's anticipated MSGP prior to proposing any changes to Tennessee's permit. That was a good reason then and the impending deadline is a good reason now.

Thanks.



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Water Pollution Control Director, 1988-2012
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