

From: [Karina Bynum](#)
To: [Elizabeth Rorie](#)
Cc: [Ann Morbitt](#); [Ariel Wessel-Fuss](#)
Subject: Fw: 2023 Facility Monitoring Exceedance Letters
Date: Thursday, January 4, 2024 11:44:06 AM
Attachments: [image001.png](#)
[Outlook-1hndxpbe.png](#)
[Outlook-qjpxkiln.png](#)

Beth,
Could you please upload these to waterlog.
Thank you,

Karina Bynum, Ph.D., P. E. | Integrated Water Resources Engineer
Building Communities and Restoring Watershed Health

Division of Water Resources
1221 South Willow Avenue, Cookeville, TN 38506
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From: Klint Rommel <Klint.Rommel@tn.gov>
Sent: Wednesday, January 3, 2024 3:08 PM
To: Karina Bynum <Karina.Bynum@tn.gov>; Ann Morbitt <Ann.Morbitt@tn.gov>
Cc: Ariel Wessel-Fuss <Ariel.Wessel-Fuss@tn.gov>; Hannah Riether <Hannah.Riether@tn.gov>; Trenton Thomas <Trenton.Thomas@tn.gov>; Carma H. Smith <Carma.H.Smith@tn.gov>
Subject: 2023 Facility Monitoring Exceedance Letters

Good afternoon!

Attached you will find the Exceedance Letters from the 2023 TDOT Facility Stormwater Sampling.

As always, we will work with the facilities and the regions to get these issues addressed.

Please let me know if there is any additional information I may need to supply.

Thank you!



Klint Rommel | Transportation Manager I
Environmental Division, Facility Compliance Section Manager
James K. Polk Building, 9th Floor
505 Deaderick St., Nashville, TN 37243
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DEPARTMENT OF TRANSPORTATION**

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BUTCH ELEY
DEPUTY GOVERNOR &
COMMISSIONER OF TRANSPORTATION

BILL LEE
GOVERNOR

January 3, 2024

Ms. Karina Bynum, PhD, PE
Tennessee Department of Environment and Conservation
Division of Water Resources
1221 South Willow Avenue
Cookeville, Tennessee 38506

**Re: Tennessee Department of Transportation Facility Monitoring Results
Dunlap District Garage**

Dear Ms. Bynum:

Per Section 2.1.6.5 of the Tennessee Department of Transportation (TDOT) Municipal Separate Storm Sewer System Permit TNS077585, a State-Wide Facility Storm Water Monitoring Plan (SFMP) has been developed and implemented in each permit year to sample storm water runoff from 19 representative TDOT facilities, one of which was the Dunlap Garage. The storm water samples collected from the Dunlap Garage are sent to a certified laboratory and tested for pH, as well as the potential pollutants oil and grease, chemical oxygen demand, total suspended solids (TSS), and chloride. As a courtesy, the Tennessee Department of Environment and Conservation is notified when sampling results are greater than the pollutant action level specified in the SFMP.

On July 24, 2023, EnSafe Inc., consultants to the TDOT Environmental Compliance Office, conducted analytical monitoring of the storm water discharge from the Dunlap District Garage in Dunlap, Tennessee, according to the methods and requirements of the SFMP. The final laboratory analytical report from this sampling event was received on August 3, 2023. Samples were acquired from the principal outfall, Outfall 77-D-02, and lab results included a value for oil and grease of 23.8 milligrams per liter (mg/L), which exceeds the action level concentration of 10 mg/L specified in the SFMP. The sample also yielded a measured TSS concentration of 1,330 mg/L, which exceeds the action level concentration of 150 mg/L. Several leaks and spills were observed around the lot which could have been a source of the elevated oil and grease levels. It is recommended for facility personnel to follow TDOT's Standard Environmental Procedures and use absorbents on all oil leaks and spills to prevent pollutants from being carried off in storm water. Used absorbents should be collected and properly disposed of. If necessary, a spill report should be filled out to document how it was addressed and filed in both the facility's Storm Water Pollution Prevention Plan and Spill Prevention Control and Countermeasure Plan. It was unclear why the TSS was above the action level. There were no soil stockpiles on site and

no actively eroding areas. Site personnel should check the storm sewer pipe at the outfall and clean it out if necessary. Please see the attached photo log.

The Storm Water Pollution Prevention Plan for this facility will be revised to incorporate the lab results.

Please distribute this letter within your department to the appropriate personnel. If you have any questions or concerns, then please email me at Klint.Rommel@tn.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Klint Rommel", written in a cursive style.

Klint Rommel
Facility Compliance Section Manager
TDOT Environmental Division

Attachments:

Attachment A — Photographic Log

Attachment A
Photographic Log



Dunlap District Garage

Region 2
Outfall 77-D-02

Photograph 1

Note: View from sampler installed at the outfall down a grass lined ditch. The storm water sample exceeded action levels for chemical oxygen demand and total suspended solids (TSS) and oil and grease (O&G). There were no sediment deposits or oil staining observed in the grassy ditch.



Photograph 2

Note: View looking upslope from the installed stormwater sampler. There was no clear sign of where the higher levels of TSS were coming from. Site personnel should check the storm sewer pipe at the outfall and see if it needs to be cleaned out. The lot should be swept as needed.



**Dunlap District
Garage**

**Region 2
Outfall 77-CD-02**

Photograph 3

Note: View of one of several oil stains observed around the lot.

Site personnel should use absorbents to address oil leaks and spills.

A spill report should be filled out to document the spill in the SWPPP.



Photograph 4

Note: View of another of several oil stains observed around the lot.

Site personnel should use absorbents to address oil leaks and spills.

A spill report should be filled out to document the spill in the SWPPP.