

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
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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
Loudon County 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 Loudon County Garage. The storm water samples collected from the Loudon County Garage are sent to a certified laboratory and tested for pH, as well as the potential pollutants oil and grease, chemical oxygen demand (COD), 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 May 15, 2023, EnSafe Inc., consultants to the TDOT Environmental Compliance Office, conducted analytical monitoring of the storm water discharge from the Loudon County Garage in Lenoir City, Tennessee, according to the methods and requirements of the SFMP. The final laboratory analytical report from this sampling event was received on May 26, 2023. Samples were acquired from the principal outfall, Outfall 53-C-01, and lab results included a value for COD of 320 milligrams per liter (mg/L), which exceeds the action level concentration of 120 mg/L specified in the SFMP. The sample also yielded a measured TSS concentration of 168 mg/L, which exceeds the action level concentration of 150 mg/L. One possible source of the elevated COD is petroleum leaks/spills observed in several places on the lot. 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. Spill reports should be filled out as needed to document how it was addressed. Another possible source of COD is the decaying vegetation observed near the outfall. The likely source of the high TSS is the exposed area and sediment deposits near the outfall. Much of this area has been previously

stabilized with riprap but additional steps need to be taken to stabilize the exposed areas with vegetation or riprap. 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



**Loudon County
Garage**

**Region 1
Outfall 53-C-01**

Photograph 1

Note: View of the area immediately upslope of Outfall 53-C-01. The stormwater sample collected at the outfall tested high for chemical oxygen demand (COD) and total suspended solids (TSS). The majority of the lot is paved with no signs of erosion or sediment deposits. The slightly elevated TSS levels likely came from area pictured. Additional stabilization may be required.



Photograph 2

Note: View of the general condition of the lot upslope of Outfall 53-C-01. Some small petroleum leaks were observed which can contribute to elevated COD. Site personnel should use absorbents to address any spills and properly dispose of the material as required by TDOT's Standard Environmental Procedures. COD can also go up due to decaying vegetation around the outfall.



Loudon County Garage

Region 1
Outfall 53-C-01

Photograph 3

Note: Another view of the lot upslope of Outfall 53-C-01. In general, it was in good condition with a few minor oil leaks observed that need to be properly addressed.



Photograph 4

Note: View of the stormwater sample collected from Outfall 53-C-01. The sample measured 168 mg/L for TSS which exceeds the action level of 150 mg/L.