

**From:** [Karina Bynum](#)  
**To:** [Elizabeth Rorie](#)  
**Cc:** [Ann Morbitt](#); [Ariel Wessel-Fuss](#)  
**Subject:** Fw: 2022 Facility Monitoring Exceedance Letters  
**Date:** Thursday, January 12, 2023 3:29:04 PM  
**Attachments:** [image001.png](#)  
[Outlook-3lwtom4.png](#)

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Please upload to TDOT MS4 waterlog and send an acknowledgement out.

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  
[karina.bynum@tn.gov](mailto:karina.bynum@tn.gov) | (931) 217-6638



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**From:** Klint Rommel <Klint.Rommel@tn.gov>  
**Sent:** Thursday, January 12, 2023 2:28 PM  
**To:** Karina Bynum <Karina.Bynum@tn.gov>  
**Cc:** Carma H. Smith <Carma.H.Smith@tn.gov>  
**Subject:** 2022 Facility Monitoring Exceedance Letters

Good afternoon Karina!

Attached you will find the Exceedance Letters for facilities that have surpassed the threshold limits in one or more categories established in the State-Wide Facility Storm Water Monitoring Plan (pH, oil and grease, Chemical Oxygen Demand, Total Suspended Solids, and Chloride).

Within the letters are recommendations the ECO will administer to address any exceedance categories.

Please let me know if you have any questions or would like additional information.

Thank you and have a great rest of the week!



**Klint Rommel** | Transportation Manager I  
Environmental Division, Facility Compliance Section Manager  
James K. Polk Building, 9<sup>th</sup> Floor  
505 Deaderick St., Nashville, TN 37243  
p. 615-253-2419 c. 615-478-5169



**STATE OF TENNESSEE  
DEPARTMENT OF TRANSPORTATION**

**ENVIRONMENTAL DIVISION  
ENVIRONMENTAL COMPLIANCE OFFICE**  
SUITE 900, JAMES K. POLK BUILDING  
505 DEADERICK STREET  
NASHVILLE, TENNESSEE 37243-1402  
(615) 741-3655

**BUTCH ELEY**  
DEPUTY GOVERNOR &  
COMMISSIONER OF TRANSPORTATION

**BILL LEE**  
GOVERNOR

January 11, 2023

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  
Anderson 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 Anderson County Garage. The storm water samples collected from the Anderson 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 23, 2022, EnSafe Inc., consultants to the TDOT Environmental Compliance Office (ECO), conducted analytical monitoring of the storm water discharge from the Anderson County Garage in Clinton, Tennessee, according to the methods and requirements of the SFMP. The final laboratory analytical report from this sampling event was received on June 21, 2022. Samples were acquired from the principal outfall, Outfall 01-C-04, and lab results included a value for COD of 165 milligrams per liter (mg/L), which exceeds the action level concentration of 120 mg/L for COD specified in the SFMP. The sample also yielded a measured total suspended solids concentration of 283 mg/L, which exceeds the action level concentration of 150 mg/L. The chloride level was 1,000 mg/L, which approached the action level of 1,200 mg/L. Dead vegetation was observed beyond the fence line but there was no salt staining on the ground or other clear indications of a chloride source. The COD levels may have been raised by decomposing

vegetation and TSS levels raised by the exposed soil. There were no observed spills or other obvious sources of the high COD levels. The ECO recommends efforts be taken to stabilize the area around the outfall and either reestablish vegetation or place additional riprap. Site personnel should continue to address spills and de-icing operations per the TDOT standard operating procedures. 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](mailto:Klint.Rommel@tn.gov).

Sincerely,

**Klint**

**Rommel**

Klint Rommel  
Facility Compliance Section Manager  
TDOT Environmental Division

Digitally signed by Klint  
Rommel  
Date: 2023.01.12  
12:37:59 -06'00'

Attachments:

Photographic Log





**Anderson County  
Garage**

**Region 1  
Outfall 01-C-04**

**Photograph 1**

**Note:** View looking southeast at Outfall 01-C-04. The collected storm water sample exceeded the action levels for total suspended solids (TSS) and chemical oxygen demand (COD), likely due to the exposed soil and dead vegetation. The area needs to be stabilized with vegetation or other means if vegetation cannot be established.



**Photograph 2**

**Note:** Stabilize exposed areas by reestablishing vegetation or placing riprap. Chloride levels were elevated but did not exceed the action level. It is suspected that a brine release may have occurred and it may take an extended amount of time for the residual chloride levels in the soil to be reduced.





**Anderson County  
Garage**

**Region 1  
Outfall 01-C-04**

**Photograph 3**

**Note:** View of the typical condition of the paved lot. No other sources of total suspended solids or COD were observed.



**Photograph 4**

**Note:** View of the storm water sample from Outfall 41-C-01. Sources of high COD and TSS were likely caused by decaying vegetation and exposed soil near the outfall.