

**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**  
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505 DEADERICK STREET  
NASHVILLE, TENNESSEE 37243-1402  
(615) 741-3655

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

**BILL LEE**  
GOVERNOR

January 10, 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  
Arlington 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 Arlington District Garage. The storm water samples collected from the Arlington District 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 July 29, 2022, EnSafe Inc., consultants to the TDOT Environmental Compliance Office (ECO), conducted analytical monitoring of the storm water discharge from the Arlington District Garage in Shelby County, Tennessee, according to the methods and requirements of the SFMP. The final laboratory analytical report from this sampling event was received on August 19, 2022. Samples were acquired from two principal outfalls, Outfall 79-D-02 and 79-D-03. All tested parameters sampled from the stormwater discharge at Outfall 79-D-02 were within the acceptable range. Lab results from Outfall 79-D-03 included a value of 159 milligrams per liter (mg/L) for COD, which exceeds the action level concentration of 120 mg/L; a value of 168 mg/L for TSS, which exceeds the action level concentration of 150 mg/L; and a value of 3,140 mg/L for chloride, which exceeds the action level of 1,200 mg/L. There were no observed spills or other obvious sources of the high COD levels, but COD can be affected by standing water or recently cut and decaying

vegetation. Fines from the gravel lot are the likely source of elevated TSS. Chloride levels may be elevated from residual salt that has settled out in the gravel lot and ditch line, but there was no visible source. All salt was observed to be under cover in designated sheds and back from the entrance. A concrete berm has previously been installed at the entrance to one of the sheds where water was entering. Site personnel should continue to address spills and salt-loading 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**

Digitally signed by Klint  
Rommel  
Date: 2023.01.12 12:32:49  
-06'00'

Klint Rommel  
Facility Compliance Section Manager  
TDOT Environmental Division

Attachments:

Photographic Log





## Arlington District Garage

**Region 4  
Outfall 79-D-03**

### Photograph 1

**Note:** View from the entrance of the salt shed looking west toward Outfall 79-D-03. Salt is under cover but there was some chloride staining visible. The collected storm water sample exceeded the action levels for chloride, total suspended solids, and chemical oxygen demand.



### Photograph 2

**Note:** View from Outfall 79-D-03 looking east. Much of the facility's surface is covered with gravel which is likely holding salt that can't be swept up and a potential source of suspended solids. It is recommended that the areas in front of the salt sheds and other salt-handling areas be paved so that salt can be swept up more completely.





**Arlington District  
Garage**

**Region 4  
Outfall 79-D-03**

**Photograph 3**

**Note:** View from Outfall 79-D-03. Deposited sediment should be removed to reduce the amount of suspended solids and salt that may have been trapped by the sediment.



**Photograph 4**

**Note:** View of the storm water sample collected from Outfall 79-D-03.