

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](#)

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 | (931) 217-6638



We value your feedback! Please complete our [customer satisfaction survey](#).

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, 9th 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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(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
Clarksville 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 Clarksville District Garage. The storm water samples collected from the Clarksville 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, 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 Clarksville District Garage in Montgomery County, Tennessee, according to the methods and requirements of the SFMP. The final laboratory analytical report from this sampling event was received on June 17, 2022. Samples were acquired from the principal outfall, Outfall 63-D-02, and lab results included a value for COD of 154 milligrams per liter (mg/L), which exceeds the action level concentration of 120 mg/L for COD specified in the SFMP. 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. The high COD in the stormwater runoff is likely due to natural causes such as the grassy areas at the facility and associated decaying matter. Site personnel should continue to address spills 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.

Sincerely,

Klint Rommel  Digitally signed by Klint
Rommel
Date: 2023.01.12 12:37:14
-06'00'

Klint Rommel
Facility Compliance Section Manager
TDOT Environmental Division

Attachments:
Photographic Log



Clarksville District Garage

Region 3
Outfall 63-D-02

Photograph 1

Note: View upslope of Outfall 63-D-02. The collected storm water sample exceeded the action levels for chloride and chemical oxygen demand (COD). Decaying vegetation is the likely source of COD in the storm water sample.



Photograph 2

Note: View of the riprapped ditch line which discharges at Outfall 63-D-02. Stagnant water from the ditch line could be a possible source of COD.



**Clarksville District
Garage**

**Region 3
Outfall 63-D-02**

Photograph 3

Note: View of the storm water sampler installed at the inlet of the culvert at Outfall 63-D-02.



Photograph 4

Note: View of the storm water sample collected at Outfall 63-D-02. There was no observable cause for high COD levels due to facility operations.