

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



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BUTCH ELEY
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
Dickson County I-40 Eastbound Salt Shed**

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 Dickson County I-40 Eastbound Salt Shed. The storm water samples collected from the Dickson County I-40 Eastbound Salt Shed are sent to a certified laboratory and tested for pH, as well as the potential pollutants 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 March 23, 2022, EnSafe Inc., consultants to the TDOT Environmental Compliance Office (ECO), conducted analytical monitoring of the storm water discharge from the Dickson County I-40 Eastbound Salt Shed near Dickson, Tennessee, according to the methods and requirements of the SFMP. The final laboratory analytical report from this sampling event was received on March 29, 2022. Samples were acquired from the principal outfall, Outfall 22-S-02, and results from the sample included a value for TSS of 408 milligrams per liter (mg/L), which exceeds the action level concentration of 150 mg/L for TSS specified in the SFMP. The sample also yielded a measured chloride concentration of 2,510 mg/L, which exceeds the action level concentration of 1,200 mg/L. The TDOT Standard Environmental Procedure for salt-handling requires all salt to be undercover prior to the next rain event and in no circumstance is salt to be left out exposed

to storm water. Salt had been delivered and loaded into the shed, but additional actions are needed (using a sweeper or flat shovels/brooms) to ensure all salt is stored in the shed and not exposed to stormwater. One hole was also observed in the salt shed roof and should be repaired. TDOT currently has a vendor, under contract, working their way across the state to repair damaged roofing on salt sheds. TSS exceeded the action level, but the source is believed to have been from the hole dug to install the sampler. There was no erodible stockpiled material onsite and no active erosion or sediment deposits were observed. 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 12:34:27
-06'00'

Klint Rommel
Facility Compliance Section Manager
TDOT Environmental Division

Attachments:
Photographic Log



Dickson County I-40 EB Salt Shed

Region 3
Outfall 22-S-02

Photograph 1

Note: View of the paved lot from the front of the salt shed. Loading operations have been ongoing and there was some salt-staining visible on the pavement.



Photograph 2

Note: View of salt in front of the shed, leftover from loading operations. Salt has been pushed back into the shed with the loader but a sweeper or flat shovels and brooms needs to be used to minimize the amount of salt left outside. TDOT Standard Environmental Procedures requires salt to be under cover prior to the next rain event.



Dickson County I-40 EB Salt Shed

Region 3
Outfall 22-S-02

Photograph 3

Note: There is visible evidence of surface water coming into contact with salt at the entrance of the shed. Additional efforts need to be made to keep stockpiled salt away from stormwater, this may include building a berm or redirecting the stormwater in another manner. There is also a small hole in the roof (visible in top right of the photo) that should be repaired.



Photograph 4

Note: View of the ditch running along the paved drive, discharging at Outfall 22-S-02. The storm water sample exceeded action levels for total suspended solids and chloride. There was no erodible material being stockpiled or active erosion observed at the site. The higher levels of total suspended solids likely came from the ground disturbance necessary to install the sampler.