

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**
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
Hickman 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. The storm water samples for a 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, and chloride. If a facility exceeds the pollutant action level, TDOT takes steps to determine the source of the exceedance and then address it. This facility was being re-sampled due to having exceeded pollutant action levels for COD and chloride in 2021. 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 Hickman County Garage in Centerville, Tennessee, according to the methods and requirements of the SFMP. The final laboratory analytical report from this sampling event was received on August 23, 2022. Samples were acquired from the principal outfall, Outfall 41-C-01, and lab results included a value for chloride of 1,710 milligrams per liter (mg/L), which exceeds the action level concentration of 1,200 mg/L specified in the SFMP. The ECO determined last year that built-up pavement in front of the shed was causing storm water to flow toward the entrance of the shed instead of away from it. During heavy rain events, storm water is able to flow over the concrete berm at the


entrance, into the shed, and back out carrying dissolved salt with it. In order to correct this issue, the facility should regrade the pavement in front of the shed to ensure water flows away from the entrance during heavy rain events. All salt should be stored a minimum of 5 feet back from the entrance and any salt deposits outside of the shed should be swept up per TDOT's Standard Environmental Procedure. The ECO will be following up with the facility once the surface grade has been corrected. 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
12:40:06 -06'00'

Klint Rommel
Facility Compliance Section Manager
TDOT Environmental Division

Attachments:

Photographic Log



**Hickman County
Garage**

**Region 3
Outfall 41-C-01**

Photograph 1

Note: View of the entrance of the salt shed and visible salt-staining outside of it migrating toward Outfall 41-C-01. The collected storm water sample measured lower for chloride than the previous year, but still exceeded the action level. The lot needs to be regraded so that surface runoff flows away from the shed entrance.



Photograph 2

Note: View of entrance of the shed. There is visible salt-staining that should be swept and several deposits of salt that need to be shoveled back into the shed. The grade of the pavement in front of the shed will be adjusted to ensure storm water flows away from the entrance. Per TDOT's Standard Environmental Procedure, salt should be stored in a way that prevents it from coming in contact with storm water.



Hickman County Garage

Region 3
Outfall 41-C-01

Photograph 3

Note: View of the shed entrance after the rain event. The surface grade of the lot needs to be modified to prevent storm water from entering the shed.



Photograph 4

Note: View of the storm water sampler installed at Outfall 41-C-01. Elevated chloride levels in storm water runoff appears to have caused a "grass kill" and prevented vegetation from growing back.