

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**

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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
Morristown 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 Morristown District Garage. The storm water samples collected from the Morristown 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 April 1, 2022, EnSafe Inc., consultants to the TDOT Environmental Compliance Office (ECO), conducted analytical monitoring of the storm water discharge from the Morristown District Garage in Hamblen County, Tennessee, according to the methods and requirements of the SFMP. The final laboratory analytical report from this sampling event was received on April 8, 2022. Samples were acquired from the principal outfall, Outfall 32-D-01, and lab results included a value for COD of 561 milligrams per liter (mg/L), which exceeds the action level concentration of 120 mg/L specified in the SFMP. The sample also yielded a measured chloride concentration of 5,210 mg/L, which exceeds the action level concentration of 1,200 mg/L. Several active leaks were observed around the facility, which can be a source for elevated COD. Equipment should be repaired and absorbents used on oil leaks so that it is not a source of COD. There were no obvious signs for why chloride levels were high. It is suspected that salt or brine may have settled


out in the riprap ditch leading to the outfall. Site personnel should continue to follow the TDOT Standard Environmental Procedures for salt-handling and minimize the chances that salt or brine will come in contact with storm water. 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 12:39:06
-06'00'

Klint Rommel
Facility Compliance Section Manager
TDOT Environmental Division

Attachments:
Photographic Log



Morristown District Garage

Region 1
Outfall 32-D-01

Photograph 1

Note: View of one of several active equipment leaks observed at the facility. The collected storm water sample exceeded the action level for chemical oxygen demand (COD). Petroleum can cause COD levels to increase in storm water runoff. Ensure leaks are repaired when possible. Absorbents used on leaks should be swept up.



Photograph 2

Note: View of the salt shed entrance. Salt appears to be stored properly and no storm water has been coming into contact. The storm water sample collected at Outfall 32-D-01 exceeded the action level for chloride.



Morristown District Garage

Region 1
Outfall 32-D-01

Photograph 3

Note: View of the riprap-lined ditch that discharges at Outfall 32-D-01. The storm water sample tested high for COD and chloride. It is possible that there are high chloride levels due to past issues with salt-handling which allowed salt-laden water to deposit in the ditch line. Further investigation into the source of the chlorides is recommended.



Photograph 4

Note: View of riprapped outlet protection at Outfall 32-D-01.