



August 5, 2021

TDEC – Division of Water Resources
William R. Snodgrass TN Tower, 11th Floor
312 Rosa L. Parks Avenue
Nashville, Tennessee 37243-1534

ATTN: Mr. Vojin Janjic

Subject: **Draft TNCGP Comments**
TNR100000
Tennessee

Dear Mr. Janjic:

GEOServices, LLC (GEOServices) appreciates the opportunity to provide comments for the new Tennessee Construction General Permit (TNCGP). There are several changes to the TNCGP that will affect our private sector environmental consulting business, and we are glad to be able to offer our concerns, knowing this will go into the official public record.

COMMENTS

1) Twice Weekly Inspections

GEOServices conducts Erosion Prevention and Sediment Control (EPSC) inspections for multiple clients, and we are concerned with reducing the frequency to once per week. Since some 303(d) listed watersheds will still require twice weekly schedule, and some watersheds allow for once per week, this will confuse permittees. Some sites straddle multiple watersheds, and could have differing requirements for different sides of a single project site. GEOServices hires staff when we get ne EPSC inspection jobs; reducing inspection frequency may negatively impact future employment opportunities at our company.

2) Quality Assurance Site Assessment (QASA)

The QASA requirement in the expiring permit held engineers to their designs, and helped ensure EPSC measures were installed properly. The engineer/consultant would be sure to have the project move forward correctly, which would make contractors and permittees more likely to succeed in

keeping sediment from migrating away from work areas. Removing the QASA requirement will only reduce compliance, and will very likely increase the probability of permittees and contractors becoming found in non-compliance sometime in the project.

3) PE Stamp Requirement

The new TNCGP language in Section 5.2 that allows for sites greater than five acres of disturbance to have a Storm Water Pollution Prevention Plan (SWPPP) be developed by various specialists is inappropriate. SWPPPs that have technical information related to the discharge of construction stormwater should be developed by a Professional Engineer (PE), licensed to work in the State of Tennessee. While a Certified Professional in Erosion Control, or Level II Certification provides a lot of background in sediment migration and water dynamics, there is no better option than requiring a licensed PE to develop the SWPPP.

GEOServices appreciates the opportunity to provide you with the comments for the Draft TNCGP. If you have any questions or comments, please contact us at (865) 539-8242.

Respectfully submitted,
GEOServices, LLC



Jason Mann, PE, TN-QHP
Environmental Project Manager