



**STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
DIVISION OF WATER RESOURCES**

Nashville Environmental Field Office

711 R.S. Gass Boulevard

Nashville, TN 37216

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June 7, 2022

Ivan Bell
5499 Courtland Road
Springfield TN, 37172

Re: **NOTICE OF VIOLATION**
Complaint # 122348
Cattle Trails Estates
TNCGP Tracking Number(s): TNR244178
Robertson County, Tennessee

Dear Mr. Bell:

On May 18, 2022, staff from the Division of Water Resources (division) conducted a complaint investigation of Cattle Trails Estate residential subdivision project site and identified violations in need of corrective action(s). Additional information related to these violations, corrective action time frames and request for information can be found below.

Unauthorized alterations, including unauthorized discharges, to streams, wetlands, or other waters may impact their usefulness and designated uses, including support of fish and aquatic life, livestock and wildlife watering, recreation, and irrigation. As such, they are violations of the *Tennessee Water Quality Control Act of 1977* and this letter serves as a formal Notice of Violation.

To bring this site into compliance the terms and conditions of the 2021 general NPDES permit for discharges of stormwater associated with construction activities, the division requests that you immediately implement and maintain all necessary measures to ensure this site's stormwater discharge(s) have been treated to the maximum extent practicable. If any corrective actions or stabilization measures have already been implemented, please submit photographic documentation of them along with your written response to this letter.

The division does not authorize access to private property and arrangements concerning the removal of sediment or other remediation efforts on adjoining properties must be settled between

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you and the adjacent landowners. No further work should be done in any stream or wetland areas until you have written authorization from the division.

Please address the items and submit a corrective action plan (CAP) to the Nashville Environmental Field Office within 15 days of receipt of this letter. If any corrective actions or stabilization measures have already been implemented, please submit photographic documentation of them along with your response.

The division identified the following violations in need of corrective actions:

- Absence and failure erosion prevention and sediment control (EPSC) measures (EPSCs) to prevent untreated, down-gradient stormwater discharges and sedimentation offsite (see §5.5.3.1. a., b. & i. of the 2021 CGP).

Please submit a CAP documenting the completion of the following items to the Nashville Environmental Field Office within 15 days of receipt of this letter:

1. Immediately install and repair effective EPSC measures to ensure adequate treatment of the site's stormwater discharge.
2. Within 7 days of receipt of this letter, remove sediment from the wet weather conveyance to the maximum extent practicable. Heavy equipment may be used for sediment removal with the exception that the chosen method of removal will not cause further offsite and downstream discharges.
3. Be advised, failure to provide the requested items and address the site's non-compliance within the specified timeframes above, will result in the division initiating enforcement actions, which may include monetary penalties. If you have any questions regarding this correspondence, please contact me at Virginia Lawrence at (615) 714-0730 or by E-mail Virginia.Lawrence@tn.gov.

Sincerely,



Division of Water Resources

cc: DWR, Nashville EFO Permit File
Timmy Jennette, DWR Field Office
Jessica Murphy, DWR Compliance and Enforcement

Facility Name: Cattle Trails Estates	Site Location (Lat/Long): 36.4465, -86.7939	Tracking No.: Complaint # 122348	Date: May 18, 2022
<div data-bbox="461 357 1161 1600"><p>May 18, 2022 at 2:47:45 PM</p></div>			
<p>Photo 1. Dewatering device structure designed to dewater from the bottom contributing to untreated stormwater discharge. Photo taken by Division staff on 18-May-22.</p>			


Facility Name: Cattle Trails Estates	Site Location (Lat/Long): 36.4465, -86.7939	Tracking No.: Complaint # 122348	Date: May 18, 2022
			
<p>Photo 2. Unstable sediment and incomplete construction of detention basin contributing to offsite sediment deposition. Photo taken by Division staff on 17-MAR-2022.</p>			

Facility Name: Cattle Trails Estates	Site Location (Lat/Long): 36.4465, -86.7939	Tracking No.: Complaint # 122348	Date: May 18, 2022
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Photo 3. View of sediment entering offsite wet weather conveyance by discharge of untreated stormwater. Photo taken by Division staff on 18-MAY-2022.

Facility Name: Cattle Trails Estates	Site Location (Lat/Long): 36.4465, -86.7939	Tracking No.: Complaint # 122348	Date: May 18, 2022
			
Photo 4. Sediment deposited in offsite wet weather conveyance by discharge of untreated stormwater. Photo taken by Division staff on 18-MAY-2022.			

Facility Name: Cattle Trails Estates	Site Location (Lat/Long): 36.4465, -86.7939	Tracking No.: Complaint # 122348	Date: May 18, 2022
<div data-bbox="435 321 1182 1646"></div>			
Photo 5. Sediment deposited in offsite wet weather conveyance by discharge of untreated stormwater. Photo taken by Division staff on 18-MAY-2022.			