

**To:** Greg Young  
**From:** Joellyn Brazile  
**Date:** 2/15/2024  
**Subject:** Compliance Assistance Ford Motor Company TN0082368

Included under this Memo is documentation regarding the Compliance Assistance site visit of the Ford Motor Company Blue Oval City Memphis Regional Megasite covered under Individual Construction Permit TN0082368 conducted on January 9, 2024.

If you have any questions regarding this document, please feel free to reach to Joellyn Brazile at (901) 237-6000 or [Joellyn.Brazile@tn.gov](mailto:Joellyn.Brazile@tn.gov).

Joellyn Brazile  
Division of Water Resources

Compliance Assistance Date: January 9, 2024

TDEC-Greg Young, Joellyn Brazile and Gregg Overstreet

Ford-Ann McCormick and Blake Newbill

Walbridge-Elise Lewandowski

SME-Thomas Young

SSOE-David Flynn

Rain event of ~2" prior to inspection

Compliance Assistance observations and discussion of certain components of the site:

## **SW2/SB2 Sediment Basin**

- Slight sediment-laden water discharging from SB2
  - ❖ **SB2-3'** riprap berm never installed because always had too much water to install it. Porous baffles installed, but currently under water

## **SW4B/SB04A Sediment basin**

- Slight sediment-laden water discharging
  - ❖ **SB04A**-could not access because of muddy conditions, but site representatives stated not constructed

## **SW5B (Photo 1))**

- Discharge very sediment-laden. Drainage area contributing to SW5B is construction activity east of Fredonia Road, including MAG area.

## **Little Muddy at Keeling Road (Photo 2)**

- Water in Little Muddy very sediment-laden. Drainage area contributing to SW5B is construction activity east of Fredonia Road, including MAG area. Drainage area contributing to Little Muddy Creek, includes area associated with SW6, SW11, SW7 and SW12.

**MAG Area** *Discussed creating cells within the basins to move water around until it can be treated and released. Slow release better.*

- ❖ **S03MAG**-not at grade, no internal components, no discharge pipe, still need to cut 5-6ft. Currently draining/discharging towards western end towards Fredonia Rd. Area surrounding basin was not stabilized. *Recommended during site discussion earthen berm be installed at downgradient end and to use cells within basin to help provide treatment (use pumps to move water around).* (Photos 3 and 4)
- ❖ **S05MAG**-no internal components, but holding water, no discharge pipe installed. Area surrounding basin was not stabilized. (Photo 5)
- ❖ **S02MAG**-no internal components, but holding water, no discharge pipe installed. Area surrounding basin was not stabilized. (Photo 6)

- ❖ **S01MAG**- no internal components, but holding water, no discharge pipe installed. Area surrounding basin was not stabilized. (Photo 7)

**SW6/S06A Sediment Basin** *During site discussion, discussed need for skimmer outlet control structures to be installed.*

- Sediment-laden discharge from S06A was entering Stream 1-B at SW6. (Photo 10)
  - ❖ **S06A**-Porous baffles had been installed, but no skimmer outlet structure installed. Only riprap check dam installed at outlet end of basin. Basin segregated. Fredonia Road acting as earthen berm. Grass establishing on internal slopes of sediment basin. (Photo 8 and 9)

#### **SW11/S11A Sediment Basin**

- Due to muddy conditions, unable to determine if discharge was occurring from S11A and entering Stream 1-B at SW11.
  - ❖ **S11A**- Porous baffles had been installed, but no skimmer outlet structure installed. Only riprap check dam installed at outlet end of basin. (Photo 11)

#### **SW17A**

- By railroad tracks. Slopes establishing vegetation.

#### **SW17B**

- Good condition, no issues observed

#### **SW18**

- Sediment-laden discharge. *Recommended during site discussion the need to explore source of discharge. Likely stockpiles upgradient from the outfall point.*

**Couldn't access Fredonia Loop Road from Keeling**

#### **Stream 2**

- Sandstone rock check dam had been placed across western end of stream channel. (Photo 12)  
*Recommended during site discussion rock be removed because instream treatment structures are not allowed in-stream.*

#### **Stream 1-A**

- As noted during November 2023 ARAP inspection, portion of the stream channel was realigned to flow south of **S12A** sediment basin, instead of through a culvert/pipe as per ARAP plans and permit. Check dams installed across channel in several locations. Internal channel slopes appeared vegetated.

#### **SW7**

- Considerable amount of sediment-laden discharge entering confluence of Stream 1-A, Stream 2 and Stream 9. *Recommended during site discussion, all internal components of sediment basin, including but not limited to the skimmer be installed immediately. Recommended during the site discussion to stabilize all slopes.*
  - ❖ **S07A**-Couldn't access because of muddy conditions

- ❖ **S07B**-Porous baffles were installed and grass was establishing on internal banks of basin and external slopes of the sediment basin. Nonporous baffles were not installed or skimmer. Basin was discharging a considerable amount of sediment-laden water into confluence of Stream 1-A and Stream 2 which flows north into Stream 9. (Photos 13-17)

**SW12/S12A Sediment Basin**

- Slight sediment-laden water discharging into confluence of Stream 1-A and Stream 2 (Photo 17)
  - ❖ **S12A**-could not access because of muddy conditions, but site representatives stated no skimmer installed.

**SW9/S09A Sediment Basin**

- SW9 was not observed during inspection
  - ❖ **S09A**-Site representatives confirmed no internal components such as baffles or skimmer installed; however, areas of the site upgradient of the basin had additional check dams and detention ability.

**SW10A/S10A Sediment Basin**

- **SW10** was not observed during inspection
  - ❖ **S10A**-Site representatives confirmed sediment basin had not been constructed


**SW20**

- Check dam installed with mulch berm upgradient of check dam


**SW8/S08MPL Sediment Basin**

- No discharge at **SW8** because **S08MPL** sediment basin was discharging via emergency spillway
  - ❖ **S08MPL**-Site representatives confirmed no internal components such as baffles or skimmer installed. Sediment-laden water was discharging via emergency spillway.


## Photographic Log

Project:		Site Location:	Permit No.:
Memphis Regional Megasite-Blue Oval City		S. of Keeling Road, W. of Hwy 222	TN0082368
Photo No.	Date		
1	1-9-24		
<b>Description</b> Outfall <b>SW5B</b> -Sediment-laden water observed. Drainage area contributing to <b>SW5B</b> is construction activity east of Fredonia Road, including MAG area.		<div> <div> DIRECTION 219 deg(T) </div> <div> 35.44000°N 089.43581°W </div> <div> ACCURACY 9 m DATUM WGS84 </div> </div>  <div> 2024-01-09 10:05:24-06:00 </div>	


## Photographic Log

Project:		Site Location:		Permit No.:
Memphis Regional Megasite-Blue Oval City		S. of Keeling Road, W. of Hwy 222		TN0082368
Photo No.	Date			
2	1-9-24			
<b>Description</b> Confluence of discharge from outfall <b>SW5B</b> and <b>Little Muddy Creek</b> . Water was sediment-laden. Drainage area contributing to <b>SW5B</b> is construction activity east of Fredonia Road, including MAG area. Drainage area contributing to Little Muddy Creek, includes area associated with <b>SW6</b> , <b>SW11</b> , <b>SW7</b> and <b>SW12</b> .		<div> <div> DIRECTION 185 deg(T) </div> <div> 35.43998°N 089.43630°W </div> <div> ACCURACY 8 m DATUM WGS84 </div> </div>  <div> 2024-01-09 10:04:36-06:00 </div>		


## Photographic Log

Project:		Site Location:		Permit No.:
Memphis Regional Megasite-Blue Oval City		S. of Keeling Road, W. of Hwy 222		TN0082368
Photo No.	Date		DIRECTION 35.43701°N 64 deg(T) 089.43300°W ACCURACY 8 m DATUM WGS84	
3	1-9-24			
<b>Description</b> View of eastern portion of <b>S03MAG</b> . Sediment basin was not at grade, no internal components, no discharge pipe, still need to cut 5-6ft. Currently draining/discharging towards western end towards Fredonia Rd (see photo 4). <i>Recommended during site discussion earthen berm be installed at downgradient end and to use cells within basin to help provide treatment (use pumps to move water around).</i>				


## Photographic Log

Project:		Site Location:		Permit No.:	
Memphis Regional Megasite-Blue Oval City		S. of Keeling Road, W. of Hwy 222		TN0082368	
Photo No.	Date		DIRECTION 306 deg(T)		
4	1-9-24		35.43702°N 089.43300°W		
<b>Description</b> View of western portion of S03MAG. Sediment basin was not at grade, no internal components, no discharge pipe, still need to cut 5-6ft. Discharge from basin directed towards Fredonia Road. Area surrounding basin was not stabilized. <i>Recommended during site discussion earthen berm be installed at downgradient end and to use cells within basin to help provide treatment (use pumps to move water around).</i>			ACCURACY 10 m DATUM WGS84		
					

## Photographic Log

Project:		Site Location:		Permit No.:	
Memphis Regional Megasite-Blue Oval City		S. of Keeling Road, W. of Hwy 222		TN0082368	
Photo No.	Date		<div><div>DIRECTION 161 deg(T)</div><div>35.43624°N 089.43296°W</div><div>ACCURACY 9 m DATUM WGS84</div></div>		
5	1-9-24				
<b>Description</b> View of <b>S05MAG</b> . No internal components or discharge pipe had been installed. Area surrounding basin was not stabilized.		<div></div> <div><div>2024-01-09 10:25:35-06:00</div></div>			


## Photographic Log

Project:		Site Location:		Permit No.:	
Memphis Regional Megasite-Blue Oval City		S. of Keeling Road, W. of Hwy 222		TN0082368	
Photo No.	Date		DIRECTION 285 deg(T) 35.43571°N 089.43333°W ACCURACY 11 m DATUM WGS84		
6	1-9-24				
<b>Description</b> View of <b>S02MAG</b> . No internal components or discharge pipe had been installed. Area surrounding basin was not stabilized.					
			2024-01-09 10:29:38-06:00		

## Photographic Log

Project:		Site Location:	Permit No.:
Memphis Regional Megasite-Blue Oval City		S. of Keeling Road, W. of Hwy 222	TN0082368
Photo No.	Date		
7	1-9-24		
<b>Description</b> View of S01MAG. No internal components or discharge pipe had been installed. Area surrounding basin was not stabilized.		January 9, 2024 at 10:55:24 AM N 35.434850°, W 89.435726° Fredonia Rd, Haywood County	

## Photographic Log

Project:		Site Location:	Permit No.:
Memphis Regional Megasite-Blue Oval City		S. of Keeling Road, W. of Hwy 222	TN0082368
Photo No.	Date		
8	1-9-24		
<b>Description</b> View of <b>S06A</b> sediment basin. Porous baffles were installed and grass was establishing on internal banks of basin. No skimmer installed (see photo 9).		January 9, 2024 at 10:41:33 AM N 35.433037°, W 89.440857° Keeling Rd, Haywood County	

## Photographic Log

Project:		Site Location:	Permit No.:
Memphis Regional Megasite-Blue Oval City		S. of Keeling Road, W. of Hwy 222	TN0082368
Photo No.	Date		
9	1-9-24		
<b>Description</b> View of <b>S06A</b> . No skimmer outlet structure installed. Only a rip rap check dam. <b>S06A</b> was discharging sediment-laden water into <b>Stream 1-B</b> (see photo 10).		January 9, 2024 at 10:41:36 AM N 35.433037°, W 89.440857° Keeling Rd, Haywood County	


## Photographic Log

Project:		Site Location:	Permit No.:
Memphis Regional Megasite-Blue Oval City		S. of Keeling Road, W. of Hwy 222	TN0082368
Photo No.	Date		
10	1-9-24		
<b>Description</b> View of sediment-laden discharge from S06A into Stream 1-B.		January 9, 2024 at 10:41:57 AM N 35.432899°, W 89.440883° Keeling Rd, Haywood County	

## Photographic Log

Project:		Site Location:	Permit No.:
Memphis Regional Megasite-Blue Oval City		S. of Keeling Road, W. of Hwy 222	TN0082368
Photo No.	Date		
11	1-9-24		
<b>Description</b> View of <b>S11A</b> sediment basin. Porous baffles were installed and grass was establishing on internal banks of basin. No skimmer outlet structure installed. Only a rip rap check dam. Due to muddy conditions, unable to determine if discharge was occurring.		January 9, 2024 at 10:43:30 AM N 35.432863°, W 89.440907° Keeling Rd, Haywood County	


## Photographic Log

Project:		Site Location:	Permit No.:
Memphis Regional Megasite-Blue Oval City		S. of Keeling Road, W. of Hwy 222	TN0082368
Photo No.	Date		
12	1-9-24		
<b>Description</b> Sandstone rock was placed in <b>Stream 2</b> . <i>Recommended during site discussion rock be removed because instream treatment structures are not allowed in-stream.</i>		 <p>January 9, 2024 at 11:55:47 AM            N 35.427945° W 89.443572°            Keeling Rd, Haywood County</p>	


## Photographic Log

Project:		Site Location:		Permit No.:
Memphis Regional Megasite-Blue Oval City		S. of Keeling Road, W. of Hwy 222		TN0082368
Photo No.	Date			
13	1-9-24			
<b>Description</b> View of <b>S07B</b> sediment basin. Porous baffles were installed and grass was establishing on internal banks of basin. No non-porous baffles or skimmer outlet structure installed. <b>S07B</b> was discharging sediment-laden water into confluence of <b>Stream 1-A</b> and <b>Stream 2</b> (see photos 16-17).		<div> <div> DIRECTION 338 deg(T) </div> <div> 35.42774°N 089.43798°W </div> <div> ACCURACY 13 m DATUM WGS84 </div> </div>  <div> 2024-01-09 11:46:07-06:00 </div>		


## Photographic Log

Project:		Site Location:	Permit No.:
Memphis Regional Megasite-Blue Oval City		S. of Keeling Road, W. of Hwy 222	TN0082368
Photo No.	Date		
14	1-9-24		
<b>Description</b> Another view of <b>S07B</b> sediment basin. Porous baffles were installed and grass was establishing on internal banks and external slopes of basin. No non-porous baffles or skimmer outlet structure installed. <b>S07B</b> was discharging into confluence of <b>Stream 1-A</b> and <b>Stream 2</b> (see photos 16-17).		<div> <div> DIRECTION 273 deg(T) </div> <div> 35.42783°N 089.43822°W </div> <div> ACCURACY 14 m DATUM WGS84 </div> </div>  <div> 2024-01-09 11:46:41-06:00 </div>	

## Photographic Log

Project:		Site Location:	Permit No.:
Memphis Regional Megasite-Blue Oval City		S. of Keeling Road, W. of Hwy 222	TN0082368
Photo No.	Date	<div> <div> DIRECTION 281 deg(T) 35.42781°N 089.44299°W </div> <div> ACCURACY 11 m DATUM WGS84 </div> </div>  <div> 2024-01-09 11:52:57-06:00 </div>	
15	1-9-24		
<b>Description</b> View of discharge point of <b>S07B</b> sediment basin. Sediment-laden discharge entering confluence of <b>Stream 1-A</b> and <b>Stream 2</b> (see photos 16-17). No skimmer outlet control structure installed. <i>Recommended during site discussion, all internal components of sediment basin, including but not limited to the skimmer be installed immediately.</i>			

## Photographic Log

Project:		Site Location:		Permit No.:
Memphis Regional Megasite-Blue Oval City		S. of Keeling Road, W. of Hwy 222		TN0082368
Photo No.	Date			
16	1-9-24			
<b>Description</b> Another view of discharge point of <b>S07B</b> sediment basin at <b>SW7</b> . Sediment-laden discharge entering confluence of <b>Stream 1-A</b> and <b>Stream 2</b> . Slopes surrounding this area were not stabilized. <i>Recommended during the site discussion to stabilize all slopes.</i>		<div> <div> DIRECTION 330 deg(T) </div> <div> 35.42794°N 089.44360°W </div> <div> ACCURACY 11 m DATUM WGS84 </div> </div>  <div> 2024-01-09 11:54:18-06:00 </div>		


## Photographic Log

Project:		Site Location:	Permit No.:
Memphis Regional Megasite-Blue Oval City		S. of Keeling Road, W. of Hwy 222	TN0082368
Photo No.	Date	DIRECTION 286 deg(T) 35.42793°N 089.44358°W ACCURACY 6 m DATUM WGS84	
17	1-9-24		
<b>Description</b> View of sediment-laden discharge from <b>S07B</b> sediment basin via <b>SW7</b> entering confluence of <b>Stream 1-A</b> and <b>Stream 2</b> . Discharge flows north into <b>Stream 9</b> . Minimal discharge observed from <b>S12A</b> sediment basin at <b>SW12</b> (arrow).			
		2024-01-09 11:55:10-06:00	

## Photographic Log

Project:		Site Location:		Permit No.:	
Memphis Regional Megasite-Blue Oval City		S. of Keeling Road, W. of Hwy 222		TN0082368	
Photo No.	Date				
18	1-9-24				
Description					
View of <b>Stream 1-A</b> (blue arrow) that has been re-aligned to flow south of <b>S12A/SW12</b> (red arrow). ARAP plans do not show this configuration of <b>Stream 1-A</b> .					

## Photographic Log

Project:		Site Location:	Permit No.:
Memphis Regional Megasite-Blue Oval City		S. of Keeling Road, W. of Hwy 222	TN0082368
Photo No.	Date		
19	1-9-24		
<b>Description</b> View of sediment-laden discharge from <b>S01A</b> and <b>S01B</b> via <b>SW1</b> entering <b>Stream 4-A</b> . Site representatives stated that culvert road crossing east of Hwy 222 at times constricts flow in stream channel and discharge from site.		 <p>January 9, 2024 at 12:49:35 PM  N 35.431447°, W 89.406515°  SR-222, Haywood County</p>	