



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

Memphis Environmental Field Office
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Bartlett, TN 38133
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August 29, 2023

Mr. Sam Kandah
Project Manager
Ford Motor Company
Ecopsy: skandah1@ford.com
300 Town Center Drive, Suite 1100
Dearborn, MI 48216

RE: Follow-up Site Inspection
 Blue Oval City – Ford Motor Company
 NPDES Permit Number TN0082368
 Haywood County, Tennessee

Dear Mr. Kandah:

On August 1, 2023, Joellyn Brazile with the Tennessee Department of Environment and Conservation, Division of Water Resources performed a Follow-up Site Inspection from the April 2023 Compliance Evaluation Inspection and June 2023 site visit at the above-referenced site to evaluate compliance with the Individual Construction Stormwater Permit (TN0082368) and the Tennessee Water Quality Control Act of 1977. The Division appreciates the time and assistance provided by all staff involved during the Follow-up Site Inspection. Please see the sections below for details regarding the inspection.

Outfalls/Sediment Basins

During the inspection numerous outfalls and sediment basins were observed and reviewed. The Division offers the following comments for the following outfalls and/or sediment basins:

- **Outfall #2/Sediment Basin S02A** (*Photos 1-3*)-The sediment basin outlet structure was installed, including the skimmer device. However, other internal components of the basin had not been fully completed per the submitted EPSC Plans as required such as the forebay, baffles, etc. The inner slopes and surrounding area of the sediment basin had been seeded and covered with hay. Vegetative establishment was observed; however, some areas were sparsely stabilized. Hydroseed was reported to be used on the inner slopes along the water edge within the sediment basin. A rock check dam was

installed at Outfall #2. Clear water was observed within the sediment basin and discharging to Outfall #2.

- **Outfall #5A and #5B**-The area upgradient of Fredonia Road shown on the EPSC Plans as an area not to be disturbed had accumulated sediment covering the channel area. Therefore, sediment has migrated and accumulated beyond the limits of disturbance which is an indicator that sediment control measures upgradient may not be sufficiently adequate.
- **Outfall #17A**-The upgradient area associated with Outfall #17A (*Photo 5*) recently started construction and was being graded. Please ensure EPSC associated with this area are installed and functional.
- **Sediment Basin S07B** (*Photo 6*)-Sediment Basin S07B was recently installed/graded. No internal components of the basin such as the porous and non-porous baffles nor the forebay were observed installed. The principal riser pipe and skimmer were not installed, only a rip rap check dam at the discharge point of the basin. Sediment Basin S07B discharges to Outfall #7. No discharge observed during inspection. Area north of S07BA graded for parking lot construction, but storm drain inlets have not yet been installed. All internal components of the basin should be installed per submitted EPSC plans.
- **Sediment Basin S07A**-The Sediment Basin had commenced construction at the time of the inspection. Large stockpiles of sediment observed in this area. The basin should be constructed and installed according to submitted EPSC plans.
- **Sediment Basin S12A** (*Photo 7*)-Sediment Basin S12A was recently installed/graded. No internal components of the basin such as the porous and non-porous baffles nor forebay were observed installed. The principal riser pipe and skimmer were not installed, only a rip rap check dam at the discharge point of the basin. Sediment Basin S12A discharges to Outfall #7. No discharge observed during inspection. All internal components of the basin should be installed per submitted EPSC plans.
- **Sediment Basin S11A** (*Photos 8, 9 and 11*)-Sediment Basin S11A was recently installed/graded. No internal components of the basin such as the porous and non-porous baffles nor forebay were observed installed. The principal riser pipe and skimmer were not installed, only a rip rap check dam at the discharge point of the basin (*Photo 9*). Sediment Basin S11A discharges to Outfall #6. No discharge observed during inspection. Area surrounding the discharge point (*Photo 11*) was not stabilized, but appeared to be actively under construction. All internal components of the basin should be installed per submitted EPSC plans.
- **Sediment Basin S06A**-Sediment Basin S06A was recently installed/graded. Temporarily divided into 2 sections, with upgradient eastern end east of old location of Fredonia Road. Temporary culvert is installed connecting upgradient eastern end with downgradient, western portion. No internal components of the basin such as the porous and non-porous baffles were observed installed. The principal riser pipe and skimmer were not installed, only a rip rap check dam at the discharge point of the basin. No discharge observed during inspection. All internal components of the basin should be installed per submitted EPSC plans.

- **Outfall #6** (*Photos 10-12*)-Sediment Basin S11A and Sediment Basin S06A discharge to Outfall #6. This outfall also received drainage from the area south/upgradient (*Photo 13*), including drainage from Outfall #7. The area downgradient/north of the point shown in photo 10 should remain unaltered. The area upgradient/south of the point shown in photo 10 will be mitigated and replaced with a box culvert. Stockpiles of sediment observed on either side of the mitigated stream channel (*Photo 13*), which will be used as fill once the box culvert is installed. Check dams were installed within the channel and silt fence along the toe of the slopes. No discharge observed during inspection.
- **Outfall #9** (*Photo 14*)-The drainage swale upgradient of Outfall #9 was reported to be recently cleaned out (sediment removed) and check dams installed. No discharge observed during inspection.
- **Sediment Basin S09A**-not constructed as sediment basin as shown on the EPSC plans, but as sediment trap. The basin should be constructed and installed according to submitted EPSC plans.
- **Outfall #1** (*Photo 15*)-Sediment accumulation observed downgradient of Sediment Basin S01A and S01B, upgradient of Outfall #1. Sediment Basin S01A, S01B, S01G and S01F discharges towards Outfall #1. S01G and S01F not installed per EPSC plans, but were considered equalization basins, since discharge through S01B prior to Outfall #1.
- **Sediment Basin S01A** (*Photo 16*) **and S01B** (*Photo 18*)- Sediment Basin S01B discharges to Outfall #1. Portion of S01B vegetated. Principal pipe installed in S01B, but skimmer was not installed yet. Baffles, forebay and skimmer not observed installed within S01B. Sediment Basin S01A discharges to Outfall #1. Rip rap berm installed within S01A, but baffles not observed installed. No skimmer device installed within S01A. Drainage channel between Sediment Basin S01B and Sediment Basin S01A (*Photo 17*), which discharges to Outfall #1 was not stabilized, but had check dams installed. All internal components of the basins should be installed per submitted EPSC plans.

Additionally, the following information was provided regarding the sediment basins listed. They were not inspected/observed during follow-up inspection.

- **Sediment Basin S08MPL**-under construction
- **Sediment Basin S01E**-under construction
- **Sediment Basin S01J**-not fully constructed, but holding water.
- **Sediment Basin S04A**-not constructed
- **Sediment Basin S10A and S10B**-not constructed

The following Outfalls were observed, but no issues were observed during the Follow-up inspection: Outfall #4, #17B, #18, #20, #8, and #10B.

Site Assessments

Subsequent to the inspection, a review of the Site Assessments being performed monthly per Section 4.5.3.7 of the permit was conducted by the Division. Please understand that the purpose of Site Assessments per the permit is to document and verify the installation, functionality and performance of EPSC measures at each outfall draining 10 or more acres. Outfalls meeting this

drainage area typically have associated sediment basins. Therefore, the Site Assessments should document the sediment basin construction, functionality and performance. The Site Assessments appear to have commenced in April 2022. The Assessments conducted April 2022-November 2022 provided no information regarding the status of the sediment basin construction. The Assessments conducted December 2022-June 2023 document the absence of sediment basins being installed. Additionally, the Site Assessments document riparian buffer zone disturbance/removal. The condition of the sediment basins not being fully installed/completed/functional was also documented in the April 28, 2023 Compliance Evaluation Inspection/Notice of Violation (NOV) issued by the Division. The NOV required the installation of sediment basins and outlet structures where grading had occurred upgradient of the basin to align site conditions with submitted EPSC plans. During the inspection on August 1, 2023, progress had been made regarding several sediment basins, but they did not appear fully constructed as shown on the submitted EPSC plans.

Twice Weekly Inspections

Additionally, subsequent to the inspection, a review of the Twice Weekly inspection documentation per Section 4.5.3.8 of the permit was conducted by the Division. Please understand that the purpose of Twice Weekly Inspections per the permit is to ensure proper installation, maintenance and overall effectiveness of EPSCs. The Twice Weekly Inspections must verify and document functionality and performance of the EPSC measures described in the SWPPP. Per Section 4.5.3.10 (g) the Twice Weekly inspections must contain the printed name and signature of the inspector and the certification must be executed by a person who meets the signatory requirements of Section 7.6.2. Many of the Twice Weekly Inspection reports that were reviewed contained information regarding improvements needed at specific locations; however, the specific locations seemed limiting in scope and did not appear to meet the intent of Section 4.5.3.8 of the permit. For example, only one or two areas of the site would be mentioned. Additionally, the Twice Weekly Inspections were not signed by a person who meets the signatory requirements of Section 7.6.2, only by the inspector.

While the Division acknowledges that additional site inspections are being conducted (weekly visual monitoring of specific outfalls and monthly visual at Outfalls #1, #2, #6, #7, #8, #9, #10A, #11 and #12 when Turbidity, TSS and flow data is collected), in addition to the Site Assessments and Twice Weekly Inspections, the Division would like to encourage ensuring that the intent of each type of visual inspection be achieved to ensure full compliance with the permit.

Required Actions:

- 1) On or before **September 15, 2023**, submit a written response providing information regarding why sediment basins have not been installed as shown on submitted EPSC plans (i.e. skimmer, porous and non-porous baffles, forebay, etc). If a sediment basin cannot be or will not be implemented per the EPSC plan design including all internal components, then a justification as to why the plans have not been or will not be followed should be submitted explaining the equivalent control measure that is being substituted.

- 2) On or before **September 15, 2023**, submit a written response providing information regarding where riparian buffer zone disturbance and/or removal has occurred and measures providing equivalent protection that have been installed in lieu of where the buffer could be maintained. Please include a map of the impacted areas with the written response.
- 3) On or before **September 15, 2023**, submit a written response regarding improvements that will be made to the Twice Weekly Inspections to fully comply with Section 4.5.3.8 of the permit, including being signed by someone who meets the signatory requirements of Section 7.6.2.

Compliance with NPDES Permit TN0082368 requirements helps ensure stormwater discharges that are protective of downstream fish and aquatic life and water quality. If you have any questions about this letter or the required actions, please contact me at (901) 237-6000 or Joellyn.Brazile@tn.gov.

Sincerely,





Joellyn Brazile
TDEC-Environmental Consultant
Division of Water Resources



Enclosure: Photographs

ec: Elise Lewandowski, Walbridge (via email)
Ann McCormick, Ford Motor Company (via email)
TDEC/DWR/Enforcement and Compliance Unit



Photographic Log

Project:		Site Location:	Permit No.:
Blue Oval City – Ford Motor Company		Stanton, Haywood County	TN0082368
Photo No.	Date		
1	8/1/23		
Description Photo is the area downgradient of Sediment Basin S02A, upgradient of Outfall #2. Area was stabilized with vegetation in some areas, but had sparse vegetative cover in other areas as well. Water was observed discharging at Outfall #2, but was clear.		<div> <div> DIRECTION 354 deg(T) </div> <div> 35.43810°N 089.40661°W </div> <div> ACCURACY 9 m DATUM WGS84 </div> </div>  <div> 2023-08-01 10:02:30-05:00 </div>	
Photo No.	Date		
2	8/1/23		
Description View of the outfall pipe of Sediment Basin S02A, which discharges towards the area shown in photo 1 and Outfall #2. Vegetation was establishing in areas, but outside slope of basin was not stabilized.		<div> <div> DIRECTION 251 deg(T) </div> <div> 35.43810°N 089.40664°W </div> <div> ACCURACY 8 m DATUM WGS84 </div> </div>  <div> 2023-08-01 10:02:35-05:00 </div>	



Photographic Log

Project:		Site Location:	Permit No.:
Blue Oval City – Ford Motor Company		Stanton, Haywood County	TN0082368
Photo No.	Date		
3	8/1/23		
Description View of Sediment Basin S02A principal spillway, including the skimmer device. Water in the basin appeared clear and was discharging at Outfall #2. Portions of the sediment basin banks were covered with seed/hay. The area along the water's edge will be hydroseeded. Other areas were not stabilized.		<div style="display: flex; justify-content: space-between; font-size: 0.8em;"> DIRECTION 248 deg(T) 35.43697°N 089.40780°W ACCURACY 65 m DATUM WGS84 </div>  <div style="text-align: right; font-size: 0.8em;"> 2023-08-01 10:05:43-05:00 </div>	
Photo No.	Date		
4	8/1/23		
Description View of Little Muddy Creek at Keeling Road.		<div style="display: flex; justify-content: space-between; font-size: 0.8em;"> DIRECTION 173 deg(T) 35.43976°N 089.43630°W ACCURACY 15 m DATUM WGS84 </div>  <div style="text-align: right; font-size: 0.8em;"> 2023-08-01 10:22:33-05:00 </div>	

Photographic Log

Project:		Site Location:	Permit No.:
Blue Oval City – Ford Motor Company		Stanton, Haywood County	TN0082368
Photo No.	Date		
5	8/1/23		
Description View of recent grading work upgradient and associated with Outfall #17A.		<div> <div> DIRECTION 167 deg(T) 35.43639°N 089.46882°W ACCURACY 11 m DATUM WGS84 </div>  <div> 2023-08-01 10:29:36-05:00 </div> </div>	
Photo No.	Date		
6	8/1/23		
Description View looking north at the southern edge of Sediment Basin S07B. Basin was recently installed/graded. No porous or non-porous baffles were observed installed. Principal riser pipe and skimmer were not installed, only a rip rap check dam at the discharge point of the basin. Sediment Basin S07B discharges to Outfall #7. No discharge observed during inspection. Sediment Basin S07A (to the east of this location) was under construction.		<div> <div> DIRECTION 16 deg(T) 35.42625°N 089.43742°W ACCURACY 8 m DATUM WGS84 </div>  <div> 2023-08-01 10:48:14-05:00 </div> </div>	

Photographic Log

Project:		Site Location:	Permit No.:
Blue Oval City – Ford Motor Company		Stanton, Haywood County	TN0082368
Photo No.	Date		
7	8/1/23		
Description View looking at downgradient end of Sediment Basin S12A. Basin was recently installed/graded. No porous or non-porous baffles were observed installed. Principal riser pipe and skimmer were not installed, only a rip rap check dam at the discharge point of the basin. Sediment Basin S12A discharges to Outfall #7. No discharge observed during inspection.		<div style="display: flex; justify-content: space-between; font-size: 0.8em;"> DIRECTION 173 deg(T) 35.42844°N 089.44497°W ACCURACY 9 m DATUM WGS84 </div>  <div style="text-align: right; font-size: 0.7em;"> 2023-08-01 10:53:41-05:00 </div>	
Photo No.	Date		
8	8/1/23		
Description View of upgradient end of Sediment Basin S11A. Basin was recently installed/graded. No porous or non-porous baffles were observed installed. Principal riser pipe and skimmer were not installed, only a rip rap check dam at the discharge point of the basin (see photo 11). Sediment Basin S11A discharges to Outfall #6. No discharge observed during inspection.		<div style="display: flex; justify-content: space-between; font-size: 0.8em;"> DIRECTION 298 deg(T) 35.43289°N 089.44237°W ACCURACY 7 m DATUM WGS84 </div>  <div style="text-align: right; font-size: 0.7em;"> 2023-08-01 10:58:04-05:00 </div>	

Photographic Log

Project:		Site Location:	Permit No.:
Blue Oval City – Ford Motor Company		Stanton, Haywood County	TN0082368
Photo No.	Date		
9	8/1/23		
Description View of the discharge point of Sediment Basin S11A. Basin was recently installed/graded. No porous or non-porous baffles were observed installed. Principal riser pipe and skimmer were not installed, only a rip rap check dam at the discharge point of the basin. Sediment Basin S11A discharges to Outfall #6. No discharge observed during inspection.		<div style="background-color: #444; color: white; padding: 2px; font-size: 0.8em;"> DIRECTION 35.43288°N ACCURACY 5 m 38 deg(T) 089.44236°W DATUM WGS84 </div>  <div style="text-align: right; font-size: 0.7em;"> 2023-08-01 10:58:08-05:00 </div>	
Photo No.	Date		
10	8/1/23		
Description View of area of site associated with Outfall #6 (yellow arrow-see photo 12), the discharge point of Sediment Basin S11A (blue arrow-see photo 11) and Sediment Basin S06A (green arrow). Rip rap check dam at Outfall #6 (see photo 12) and in upgradient locations within channel to be replaced with box culvert.		<div style="background-color: #444; color: white; padding: 2px; font-size: 0.8em;"> DIRECTION 35.43289°N ACCURACY 9 m 76 deg(T) 089.44199°W DATUM WGS84 </div>  <div style="text-align: right; font-size: 0.7em;"> 2023-08-01 11:00:09-05:00 </div>	

Photographic Log





Project:		Site Location:	Permit No.:
Blue Oval City – Ford Motor Company		Stanton, Haywood County	TN0082368
Photo No.	Date	<div>DIRECTION39 deg(T)</div> <div>35.43286°N089.44197°W</div> <div>ACCURACY 18 mDATUM WGS84</div>  <div>2023-08-0111:01:21-05:00</div>	
11	8/1/23		
Description View of discharge point of Sediment Basin S11A at Outfall #6 (blue arrow). Area surrounding the discharge point was not stabilized, but appeared to be actively under construction.			

Photo No.	Date	<div>DIRECTION34 deg(T)</div> <div>35.43305°N089.44134°W</div> <div>ACCURACY 10 mDATUM WGS84</div>  <div>2023-08-0111:03:15-05:00</div>	
12	8/1/23		
Description View of Outfall #6 within the channel. The area downgradient/north of this point is a stream channel to remain unaltered. The area upgradient/south of this point is being mitigated and will be replaced with a box culvert.			



Photographic Log

Project:		Site Location:	Permit No.:
Blue Oval City – Ford Motor Company		Stanton, Haywood County	TN0082368
Photo No.	Date	<div> <div>DIRECTION</div> <div>177 deg(T)</div> <div>35.43287°N</div> <div>089.44195°W</div> <div>ACCURACY 10 m</div> <div>DATUM WGS84</div> </div>	
13	8/1/23	 <div>2023-08-01 11:05:48-05:00</div>	
Description The area shown in this photo, upgradient/south of the point shown in photo 10, will be mitigated and replaced with a box culvert. Stockpiles of sediment observed on either side of the mitigated stream channel (photo 13), which will be used as fill once the box culvert is installed. Check dams were installed within the channel and silt fence along the toe of the slopes.			
Photo No.	Date	<div> <div>DIRECTION</div> <div>210 deg(T)</div> <div>35.41258°N</div> <div>089.40860°W</div> <div>ACCURACY 9 m</div> <div>DATUM WGS84</div> </div>	
14	8/1/23	 <div>2023-08-01 11:46:20-05:00</div>	
Description The drainage swale associated with Outfall #9 had been recently cleaned out and check dams installed. This photo is example of check dam. No discharge at Outfall #9 was observed at the time of the inspection.			

Photographic Log

Project:		Site Location:	Permit No.:
Blue Oval City – Ford Motor Company		Stanton, Haywood County	TN0082368
Photo No.	Date	<div> <div> DIRECTION 61° deg (T) 35.43130°N 089.40698°W ACCURACY 5 m DATUM WGS84 </div>  <div> 2023-08-01 12:10:43-05:00 </div> </div>	
15	8/1/23		
Description View of sediment accumulation downgradient of Sediment Basin S01A and S01B, upgradient of Outfall #1 (green arrow).			
Photo No.	Date	<div> <div> DIRECTION 212 deg (T) 35.43114°N 089.40724°W ACCURACY 4 m DATUM WGS84 </div>  <div> 2023-08-01 12:12:17-05:00 </div> </div>	
16	8/1/23		
Description View looking south at Sediment Basin S01B, which discharges to Outfall #1. Portion of basin vegetated. Principal pipe installed, but skimmer was not installed yet. Baffles and skimmer not observed installed.			

Photographic Log

Project:		Site Location:	Permit No.:
Blue Oval City – Ford Motor Company		Stanton, Haywood County	TN0082368
Photo No.	Date	<div> <div>DIRECTION 263 deg(T)</div> <div>35.43114°N 089.40724°W</div> <div>ACCURACY 4 m DATUM WGS84</div> </div>	
17	8/1/23		
Description View of location between Sediment Basin S01B (photo 16) and Sediment Basin S01A (photo 18), which discharges to Outfall #1. Check dams observed.		<div>2023-08-01 12:12:21-05:00</div>	
Photo No.	Date	<div> <div>DIRECTION 313 deg(T)</div> <div>35.43115°N 089.40724°W</div> <div>ACCURACY 5 m DATUM WGS84</div> </div>	
18	8/1/23		
Description View of Sediment Basin S01A, which discharges to Outfall #1. Rip rap berm installed, but baffles not observed installed. No skimmer device installed.		<div>2023-08-01 12:12:28-05:00</div>	