

US EPA ARCHIVE DOCUMENT



Tennessee Valley Authority, 400 W. Summit Hill Drive, Knoxville, Tennessee 37902

Anda A. Ray  
Senior Vice President  
Office of Environment and Research

July 16, 2009

Mr. Richard Kinch  
U.S. Environmental Protection Agency  
Two Potomac Yard  
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kinch.richard@epa.gov

By e-mail

Dear Mr. Kinch:

On March 25, 2009, TVA submitted our response to your request for information about coal-combustion by-product management impoundments and included our signed authorized certification. Your original requests were received by individual TVA plant sites on March 12 and March 13. In our March 25 submittal TVA provided its existing hazard rating for our wet coal combustion impoundments.

As part of our comprehensive inspection and evaluation of all of TVA's ash and gypsum storage facilities, TVA hired a respected engineering firm, Stantec Consulting Services, Incorporated, (Stantec) to inspect, test and make recommendations on those disposal facilities. While Stantec's inspection continues, TVA has already promptly acted on preliminary recommendations from them, by implementing maintenance and engineering changes over the past few months.

Furthermore, in the interest of taking a conservative, self-critical approach, we have reassessed the potential hazard ratings of the wet storage coal combustion impoundments at each of our 11 fossil plants and the now-closed Watts Bar Plant. Using criteria based on the National Dam Safety Program, the sites were evaluated using worst case failure of the wet storage impoundments (i.e. assume 100% probability of failure) and then evaluated the consequences of such failures. As a result, impoundments at four of 12 plant sites have preliminary reclassifications to a "High" hazard potential.

TVA is developing and will implement a multi-year plan to reduce the level of potential consequences associated with our wet coal-combustion by-product storage areas, including developing emergency plans for those preliminarily classified as high hazard. When the Stantec study is completed, TVA will reassess the hazard classification and provide you with any updates.

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TVA has reviewed the submittal and determined not to assert any business confidentiality claims.

Sincerely,



Anda A. Ray

Enclosures

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