

US EPA ARCHIVE DOCUMENT



Stantec

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July 1, 2013

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Mr. John C. Kammeyer, PE
Vice President
Tennessee Valley Authority
1101 Market Street, LP 5G
Chattanooga, Tennessee 37402

Re: Response to Recommendations
USEPA CCR Impoundment Assessment
Allen Fossil Plant (ALF)
Memphis, Tennessee

Dear Mr. Kammeyer:

As requested, Stantec has reviewed the Request for Action Plan letter from USEPA dated June 13, 2013, which contains recommendations and actions by USEPA's consultant Dewberry and Davis, LLC relative to their CCR impoundment assessment conducted at TVA's Allen Fossil Plant.

The purpose of this letter is to address the Dewberry recommendations. Dewberry's recommendations followed by Stantec's corresponding responses and TVA's proposed action plan are provided below.

Recommendations Regarding the Field Observations

- 1) Repair gully erosion on the divider dike;*
- 2) Add crushed stone surfacing material in worn shallow depression on the dike crest south side where haul trucks turn into the dredge cell;*
- 3) Avoid mowing the slopes when the ground is still wet from rainfall to minimize mower ruts on the slopes;*
- 4) Observe over time the wet area at the toe of the north side exterior slope to verify that the puddle is not due to seepage. If the water source is found to be seepage, then repair the slope with an inverted filter. If the water is not from seepage, then re-grade or fill the slight depression with crushed stone surfacing material.*
- 5) Paint corroded metal parts and hardware at the spillway in the divider dike and on the gates and gate-operators at the discharge end of the primary outlet conduits.*

Response/Action Plan:

- 1) TVA has repaired the previously eroded area by installing riprap.
- 2) TVA has repaired this dike crest area by placing 4 inches of asphalt pavement.
- 3) TVA's mowing crews have been advised not to mow slopes when the ground is wet.
- 4) TVA has monitored the area and has concluded that the area is not exhibiting seepage. Additionally, the area has been regraded and also covered with crushed stone for additional protection.
- 5) TVA plans to paint the corroded materials by October 2013.

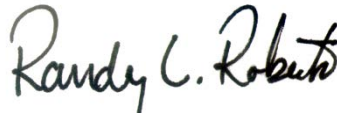
We appreciate the opportunity to provide these responses. If you have any questions or need additional information, please call.

Sincerely,

STANTEC CONSULTING SERVICES INC.



Stephen H. Bickel, PE
Senior Principal



Randy L. Roberts, PE
Principal

/cdm

Cc: Roberto L. Sanchez, PE
Michael S. Turnbow