

US EPA ARCHIVE DOCUMENT



Tennessee Valley Authority, 1101 Market Street, BR 4A, Chattanooga, Tennessee 37402

Brenda Brickhouse
Vice President
Environmental Permits & Compliance

August 16, 2013

Mr. Stephen Hoffman
U.S. Environmental Protection Agency
Two Potomac yard
2733 S. Crystal Drive
5th Floor, N-5838
Arlington, Virginia 22202-2733

Dear Mr. Hoffman:

TENNESSEE VALLEY AUTHORITY (TVA) - COAL ASH SITE ASSESSMENT ROUND 11 REVISED ACTION PLANS FOR COLBERT (COF), GALLATIN (GAF), KINGSTON (KIF), PARADISE (PAF), AND WIDOWS CREEK (WCF) FOSSIL PLANTS

Attached are the above referenced Action Plans with revised schedules as documented in the letter from TVA to the United States Environmental Protection Agency (EPA) on July 31, 2013. The Action Plans previously submitted for Allen (ALF), Bull Run (BRF) Cumberland (CUF), Johnsonville (JOF), John Sevier (JSF), Shawnee (SHF), and Watts Bar (WBF) fossil plants are still accurate.

TVA has agreed to compact our completion schedules for the above referenced facilities contingent on receiving timely environmental permits and reviews [e.g. United States Army Corps of Engineer (USACE) permits, US Fish & Wildlife Service (FWS) consultation, etc.] and no excessive weather delays during construction of the proposed actions. We appreciate the opportunity to discuss our plans with EPA and request that EPA approve these proposed schedule changes.

If you have questions or need additional information, please contact Cynthia Anderson at (423) 751-4878 in Chattanooga or by email at cmanderson@tva.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Brenda E. Brickhouse', with a long, sweeping underline.

Brenda E. Brickhouse
Vice President
Environmental Permits and Compliance

Enclosures

cc listed on page 2

Mr. Stephan Hoffman
Page 2
August 16, 2013

cc (Enclosures):

Mr. Patrick J. Flood, P.E.
Director, Division of Solid Waste Management
Tennessee Department of Environment
and Conservation
L&C Tower, 5th Floor
401 Church Street
Nashville, TN 37243

Mr. Stephan Hoffman
Page 3
August 16, 2013

CMA:LMB
Enclosures

cc (Enclosures):

Mr. Patrick J. Flood, P.E.
Director, Division of Solid Waste Management
Tennessee Department of Environment
and Conservation
L&C Tower, 5th Floor
401 Church Street
Nashville, TN 37243

cc (Enclosures):

C. M. Anderson, BR 4A-C
B. E. Brickhouse, BR 4A-C
J. C. Kammeyer, LP 5D-C
M. S. Turnbow, LP 5G-C
B. C. Portis, OMA 1A-WDC
J. A. Birdwell, WT 6A-K
D. L. Bowling, Jr., WT 7D-K
A. L. Smith, BR 4A-C
EDMS (Leslie Bailey), BR 4A-C



Stantec

Stantec Consulting Services Inc.
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Louisville KY 40223-5301
Tel: (502) 212-5000
Fax: (502) 212-5055

August 8, 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
Colbert Fossil Plant (COF)
Tuscumbia, Alabama

Dear Mr. Kammeyer:

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

It is recommended that an analysis of the impact of potential liquefaction of materials within and under Ash Pond 4 be performed now rather than upon closure of the unit.

Response/Action Plan: See below for response/action plan relative to liquefaction.

Recommendations Regarding Continued Safe and Reliable Operation

It is anticipated that the Ash Pond 4 management unit would be considered Satisfactory for continued safe and reliable operation upon: A determination that the liquefaction potential for soils and materials under the design seismic event is not a safety issue.

Response/Action Plan: TVA plans to undertake a seismic risk assessment for operating conditions for Ash Pond 4. This assessment will include evaluation of liquefaction potential, post-earthquake stability and deformation analysis, followed by a review of failure consequences if seismic analysis indicates failure. TVA intends to complete the field exploration, laboratory testing, and analyses phases by October 2014. TVA will use the

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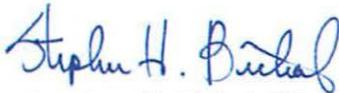
Tennessee Valley Authority
August 8, 2013
Page 2

results of the assessment to make rational, risk-informed decisions regarding mitigation strategies, if deemed to be necessary.

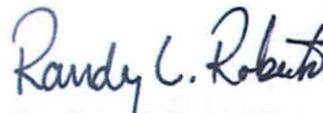
We appreciate the opportunity to provide these responses. If you have any questions or need additional information, please call.

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