

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".

Brenda E. Brickhouse
Vice President
Environmental Permits and Compliance

Enclosures

cc listed on page 2

Mr. Stephan Hoffman
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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
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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.
10509 Timberwood Circle
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
Gallatin Fossil Plant (GAF)
Gallatin, Tennessee

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 Gallatin 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 Structural Stability

Implement URS's recommended preferred remedial measures for increasing the factor of safety against non-global (maintenance-type) slope failures to the minimum factor of safety criterion for the Bottom Ash Pond A divider dike. This will involve placing a rockfill toe on the downstream (stilling pond) side of the divider dike, flattening the downstream slope by filling or cutting and filling down to the top of the rockfill, leaving a 10- foot wide bench at the top of the rockfill, and vegetating the new slope (see Appendix C – Doc 21).

Response/Action Plan: TVA is moving forward with implementing the improvements to the Pond A divider dike. URS submitted the 50% plans for construction to TVA on June 28, 2013 and the project is currently on schedule for construction completion by February 2015.

Recommendations Regarding the Hydrologic/Hydraulic Safety

Complete the project to replace the Bottom Ash Pond A spillway (scheduled completion in December 2013) and implement stilling pond complex improvements determined by URS for upgrading the ponds to safely pass the design flood flow.

Response/Action Plan: TVA is moving forward with implementing the improvements to the Pond A spillways and stilling pond complex. URS will be submitting the 90% plans for construction of the spillway improvements to TVA on June 18, 2013 and the project is currently on schedule for completion in December, 2013. For the stilling pond capacity issues, URS has performed preliminary H&H analysis and is in preliminary design stage to address needed improvements to increase the capacity. The tentative date for completion of the stilling pond improvements is August, 2015.

Recommendations Regarding the Supporting Technical Documentation

When available, provide final H & H analyses documenting that the CCR Complex will safely pass the design flood once the Bottom Ash Pond A spillway project and the stilling pond complex improvement project are completed.

Response/Action Plan: TVA will provide the final analysis upon completion of the improvement projects.

Recommendations Regarding the Field Observations

1) Repair minor erosion observed at various locations during the site visit; use cohesive soil cover on the eroded slopes and improve the vegetation growth.
2) Continue to inspect/monitor the dikes for new and existing seeps for changes that might affect the dikes' integrity. Closely inspect for new sinkholes that could impact the integrity and function of the dikes, particularly after heavy rainfalls or flooding.
It is understood from responses to the Dewberry Draft report that "improvements made in 2012 included overseeding of sparsely vegetated areas; wave wash protection for Ponds A, C, and D; and crushed stone road/dike crest covering for Ponds E, C, and D." It was indicated that TVA will continue the ongoing maintenance program through its Routine Handling, Operations, and Maintenance (RHO&M) group, which addresses items like those noted in 1) above, and will also continue its ongoing inspection program, which checks for conditions like those noted in 2) above.

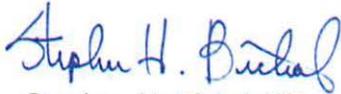
Response/Action Plan: TVA's Routine Handling, Operations and Maintenance (RHO&M) group will continue the ongoing maintenance program to repair eroded areas, improve vegetative cover, and address other items. TVA will also continue its ongoing inspection program, which includes frequent observations to monitor known seeps, and to look for changed conditions or new features.

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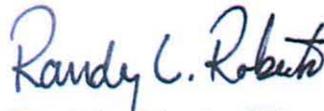
We appreciate the opportunity to provide these responses. If you have any questions or need additional information, please call.

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

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