

US EPA ARCHIVE DOCUMENT



**Stantec**

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July1, 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  
Watts Bar Fossil Plant (WBF)  
Spring City, 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 Watts Bar 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***

*It is recommended that the banks of the Tennessee River which are adjacent to the ash pond be laid back and lined with rip-rap to prevent future erosion due to wear action along the banks. It is also recommended that frequent inspections of the management unit embankment be completed until final closure is complete to visibly assess whether existing conditions are altered, helping to ensure structural stability.*

**Response/Action Plan:** TVA intends to undertake a future project to mitigate the erosion along the banks of the Tennessee River below/adjacent to the ash pond. Design will be completed in calendar year 2013 and construction is anticipated to take place in late 2013 and early 2014 while the river elevation is at winter pool. Also, TVA's Routine Handling, Operations and Maintenance (RHO&M) group will continue the ongoing inspection and maintenance program to identify and repair any noted deficiencies.

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***Recommendations Regarding the Hydrologic/Hydraulic Safety***

*TVA is currently modifying the spillway and ash pond volume to reduce the potential for ash release from major precipitation events.*

**Response/Action Plan:** The project to modify the spillway and ash pond volume is in the construction phase with anticipated completion by the end of 2013. No further action is necessary.

***Recommendations Regarding the Maintenance and Methods of Operation***

*In response to Dewberry's draft report, TVA undertook the removal of three trees with a maximum diameter of 3-4 inches, as well as maintaining excess vegetation along the pond's embankment as stated in Stantec's memo to TVA dated October 3, 2012, excess vegetation will continue to be removed and maintained as deemed necessary.*

**Response/Action Plan:** No action necessary, other than for TVA to continue its ongoing inspection and maintenance program

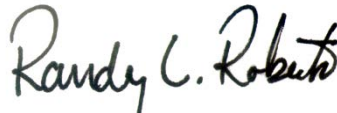
We appreciate the opportunity to provide these responses. If you have any questions or need additional information, please call.

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