



Tennessee Valley Authority
400 West Summit Hill Drive
Knoxville, Tennessee 37902-1401

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

March 25, 2009

Mr. Richard Kinch
U.S. Environmental Protection Agency
Two Potomac Yard
2733 South Crystal Drive
5th Floor: N-5783
Arlington, Virginia 22202-2733

Dear Mr. Kinch:

Enclosed is the Tennessee Valley Authority's (TVA) response to your requests for information about coal-combustion by-product management impoundments and our signed authorized certification. Your requests were received at TVA's plant sites on March 12 and March 13. Enclosed is the consolidated response from TVA for all of our fossil plants. We have also included in our response two plants (Watts Bar Fossil Plant, inactive and Cumberland Fossil Plant) for which we did not receive a request for information.

Sincerely,

A handwritten signature in black ink that reads "Anda A. Ray".


Anda A. Ray

Enclosures: 2007-2008 Annual Inspection Reports of Waste Disposal Areas for all
TVA fossil plants.
TVA Responses to EPA Information Request.
Ash Storage Summary.
Certification Form.

EPA believes that the information requested is essential to an evaluation of the threat of releases of pollutants or contaminants from these units. The provisions of Section 104 of CERCLA authorize EPA to pursue penalties for failure to comply with or respond adequately to an information request under Section 104(e). In addition, providing false, fictitious or fraudulent statements or representations may subject you to criminal penalties under 18 U.S.C. 1001.

Your response must include the following certification signed and dated by an authorized representative of Tennessee Valley Authority.

I certify that the information contained in this response to EPA's request for information and the accompanying documents is true, accurate, and complete. As to the identified portions of this response for which I cannot personally verify their accuracy, I certify under penalty of law that this response and all attachments were prepared in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.

Signature: 

Name: John C. Kammeyer

Title: VP, Engineering

This request has been reviewed and approved by the Office of Management and Budget pursuant to the Paperwork Reduction Act, 44 U.S.C., 3501-3520.

Please send your reply to:

Mr. Richard Kinch
US Environmental Protection Agency (5306P)
1200 Pennsylvania Avenue, NW
Washington, DC 20460

If you are using overnight or hand delivery mail, please use the following address:

Mr. Richard Kinch
US Environmental Protection Agency
Two Potomac Yard
2733 S. Crystal Dr.
5th Floor; N-5783
Arlington, VA 22202 2733

Tennessee Valley Authority Response to Environmental Protection Agency Request for Information

- 1. Relative to the National Inventory of Dams criteria for High, Significant, Low, or Less-than-Low, please provide the potential hazard rating for each management unit and indicate who established the rating, what the basis of the rating is, and what federal or state agency regulates the unit(s). If unit(s) does not have a rating, please note that fact.**

The dam safety hazard potential rating for each management unit is identified on the attached table. The current hazard potential ratings were assigned by TVA using the National Inventory of Dams criteria as a guideline. Hazard classifications have not been assigned to dry disposal management units. The list is updated by TVA every 2 years. No other agencies, federal or state, regulate these facilities from a dam safety perspective.

Currently, TVA has secured the services of a third party consultant to review the conditions at our coal combustion storage facilities and provide opinions relative to hazard potential. These opinions will be based on the National Inventory of Dams criteria, as well as dam safety regulations of the states in which each unit is located.

- 2. What year was each management unit commissioned and expanded?**

The year each management unit was commissioned and expanded is identified in the attached table.

- 3. What materials are temporarily or permanently contained in the unit? Use the following categories to respond to the question: (1) fly ash; (2) bottom ash; (3) boiler slag; (4) flue gas emission control residuals; (5) other. If the management unit contains more than one type of material, please identify all that apply. Also, if you identify "other", please specify, the other types of materials that are temporarily or permanently contained in the unit(s)**

The coal-combustion byproduct materials contained in each unit are identified in the attached table. Impoundments at units are also routinely used to combine and treat a variety of runoff and low volume water wastes prior to discharge.

- 4. Was the management unit(s) designed by a Professional Engineer? Is or was the construction of the waste management unit(s) under the supervision of a Professional Engineer? Is inspection and monitoring of the safety of the waste management unit(s) under the supervision of a Professional Engineer?**

Permitted solid waste landfill design documents were prepared under the supervision of a registered professional engineer, with design documents stamped by the responsible engineer. In general, for non-permitted management units, the design and construction, along with the inspection and monitoring of all management units, were performed under the supervision of professional engineers.

TVA is currently revising our program to ensure that the supervision of all design, construction, and monitoring elements for all management units will be performed by professional engineers properly licensed in the states where the project is located and that have specific experience in dam design and operation.

- 5. When did the company last assess or evaluate the safety (i.e., structural integrity) of the management unit(s)? Briefly describe the credentials of those conducting the structural integrity assessments/evaluations. Identify actions taken or planned by facility personnel as a result of these assessments or evaluations. If corrective actions were taken, briefly describe the credentials of those performing the corrective actions, whether they were company employees or contractors. If the company plans an assessment or evaluation in the future, when is it expected to occur?**

Dates of the most recent facility inspection performed by the company or its consultant are listed in the attached table. These inspections were limited to surface observations. No intrusive sampling or testing, or engineering analyses were involved. Enclosed are the 2007-2008 inspection reports which were performed by TVA staff. All 2009 inspection reports are currently under review. These 2009 inspections were performed by TVA staff (who are experienced, degreed Civil Engineers, under the supervision of a registered professional engineer), with the exception of Cumberland, Shawnee, and Watts Bar (inactive) Fossil Plants, which were performed by Stantec.

The most recent reviews at the Cumberland and Shawnee Fossil Plants were performed by Stantec. Stan Harris, PE, led those reviews. Mr. Harris has over 25 years experience in dam design, construction, and monitoring. In addition, Mr. Harris has experience leading dam safety training initiatives for the United States Army Corps of Engineers.

Recommended corrective actions resulting from these evaluations are listed in the attached table. The corrective actions have been assigned to TVA staff or contractors experienced in general earth work construction and operation/construction of coal combustion disposal facilities.

TVA has retained the services of a third party consultant, Stantec, to assess each coal combustion byproducts storage facility at the eleven (11) active and one (1) inactive fossil plant. The assessments include field reconnaissance and records review for each facility. Reports will include recommendations and a priority list for additional geotechnical and engineering evaluations, if necessary. The study is on-going with results expected by the end of April 2009.

As a part of this study, TVA has initiated geotechnical explorations of the gypsum stack at our Paradise Fossil Plant, the ash pond at our Johnsonville Fossil Plant, the gypsum stack and ash dredge cell at our Widows Creek Fossil Plant, the ash disposal facility at our John Sevier Fossil Plant, and the gypsum stack and ash stack at our Cumberland Fossil Plant.

- 6. When did a State or Federal regulatory official inspect or evaluate the safety (structural integrity) of the management unit(s)? If you are aware of a planned state or federal inspection or evaluation in the future, when is it expected to occur? Please identify the Federal or State regulatory agency or department which conducted or is planning the inspection or evaluation. Please provide a copy of the most recent official inspection report or evaluation.**

TVA facilities are subject to regulation by state agencies responsible for permitting solid waste disposal and discharging of process or storm water flows. These state agencies do perform field reviews; however TVA facilities are not subject to regulation by state agencies relative to dam safety permitting and have not been subject to review or inspections by any federal regulatory agency. Copies of the most recent issued inspection report are enclosed for the 2007-2008 time period.

- 7. Have assessments or evaluations, or inspections conducted by Federal regulatory officials conducted within the past year uncovered a safety issue(s) with the management unit(s), and, if so, describe the actions that have been or are being taken to deal with the issue or issues. Please provide any documentation that you have for these actions.**

TVA facilities are subject to regulation by state agencies responsible for permitting solid waste disposal and discharging of process or storm water flows. These state agencies do perform field reviews however; TVA facilities are not subject to regulation by state or federal regulatory agencies relative to dam safety permitting and have not been subject to review or inspections. Copies of the most recent issued inspection report are enclosed for the 2007-2008 time period.

Primarily maintenance issues were identified

during the most recent inspections. A summary of items identified are provided in the attached table. TVA is currently preparing work orders to address these items. The work will be performed by TVA staff or contractors experienced in earth work and the operation of coal combustion product disposal facilities.

- 8. What is the surface area (acres) and total storage capacity of each of the management units? What is the volume of materials currently stored in each of the management unit(s)? Please provide the date that the volume measurement(s) was taken. Please provide the maximum height of the management unit(s). The basis for determining maximum height is explained later in this Enclosure.**

The surface area, total storage capacity, volume of materials currently stored, and date of last volume measurement for each management unit are provided in the attached table. Data based on 2006 long-range plans of the projected remaining capacities ending at Fiscal Year 2008.

- 9. Please provide a brief history of known spills or unpermitted releases from the unit within the last ten years, whether or not these were reported to State or federal regulatory agencies. For purposes of this question, please include only releases to surface water or to the land (do not include releases to groundwater).**

A history of known spills or unpermitted releases from each unit within the last ten (10) years, if applicable, is listed in the attached table. All spills and unpermitted releases were reported to the appropriate state or federal agencies as required by regulation or law.

- 10. Please identify all current legal owner(s) and operator(s) at the facility.**

The United States is the owner of TVA facilities, and TVA is the operator of each facility listed in the attached table.

