



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

June 25, 2022

Transmitted via e-mail to: water.permits@tn.gov

TENNESSEE VALLEY AUTHORITY'S (TVA'S) COMMENTS TO THE TENNESSEE DEPARTMENT OF ENVIRONMENT AND CONSERVATION (TDEC) – DIVISION OF WATER RESOURCES - PROPOSED ISSUANCE OF TENNESSEE STORM WATER MULTI-SECTOR GENERAL PERMIT (MSGP) FOR INDUSTRIAL ACTIVITIES

TVA appreciates the opportunity to review and comment on TDEC's issuance of the proposed MSGP for Industrial Activities. As the nation's largest public power provider with stewardship responsibilities for land and water resources under the TVA Act, TVA supports TDEC's efforts to issue general permits that protect the state's surface waters and their designated uses.

TVA offers the following comments for TDEC's consideration:

1. In Section 3.1.2 TVA requests that TDEC add demineralized water to the list of allowable-non-stormwater discharges. Demineralized water is similar to potable water when discharged to the ground.
2. TVA would like to request that the iron benchmark be removed from the annual monitoring requirement for Sector O in Table O-2. EPA removed the iron benchmark in their 2021 MSGP based on a recommendation from the National Academies of Science (NAS) Engineering and Medicine Panel.

The NAS Panel noted that there is no nationally recommended acute criterion for iron and that few studies on the acute effects of iron on aquatic organisms exist. (NAS Panel Report, at 32). The NAS Panel also acknowledged that iron has relatively low toxicity and bioaccumulation in aquatic species. *Id.* Based on these factors, the NAS Panel recommended that EPA suspend the benchmark for iron required under Part 4.2.1.2 of the 2015 MSGP. The NAS Panel study can be found at the following link:

[Improving the EPA Multi-Sector General Permit for Industrial Stormwater Discharges |The National Academies Press](#)

Thank you for the opportunity to provide these comments. If you have any questions or wish to discuss any of these comments in greater detail, please contact Michelle Cagley at (865) 696-5038, or at amcagley@tva.gov.

Sincerely,

A handwritten signature in cursive script that reads "Maria V. Gillen".

Maria V. Gillen
Director
Environment & Energy Policy