

2574 Plant Road, Memphis, Tennessee 38109

December 10, 2023

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8383 Wolf Lake Drive
Bartlett, TN 38133



TENNESSEE VALLEY AUTHORITY (TVA) - ALLEN FOSSIL PLANT (ALF) TENNESSEE MULTI-SECTOR GENERAL PERMIT (TMSP) - TMSP TNR053184 - 30 AND 60 DAY STORMWATER EXCEEDANCE NOTIFICATION - 2023

As required by the Tennessee Storm water Multi-Sector General Permit Number TNR053184, ALF has completed annual sampling for all applicable storm water outfalls. Monitoring results indicate that the effluent concentration for Outfalls F4, F7, and F9 were above the benchmark monitoring concentration of 5 mg/l for total recoverable iron. TVA has reviewed the site storm water pollution prevention plan and on-going activities within each of the above mentioned drainage areas and proposes to improve best management practices (BMPs) as follows:

## Storm water outfall F4 (Sector O)

This drainage area includes the coal barge unloading area, north perimeter road, and northwest powerhouse yard areas

The drainage area for F4 is 4 acres and receives a portion of the drainage from the former fossil plant, which is being demolished. The area is mostly dense gravel with some vegetative cover

Storm water monitoring summary: 9.33 mg/l total recoverable iron

Benchmark Concentration: 5 mg/l total recoverable iron

# Likely source(s) of pollution:

Increased heavy equipment traffic in the drainage area attributed to activities supporting deconstruction and demolition of the site and the coal barge unloader.

#### Action:

Additional BMPs will be implemented. TVA's demolition contractor will remove sediment in the drainage basin discharging to F4, and add additional gravel if needed. TVA will evaluate the effectiveness of additional BMPs under normal sampling frequency. TVA will continue to perform quarterly visual inspections and annual monitoring at the outfall.

# Stormwater Outfall F7 (Sector O)

This area includes the western portion of the 161 kV Switchyard and TVA and contractor parking lots.

The drainage area for F7 is 17.8 acres and receives a portion of the drainage from the former fossil plant, which is being demolished. The area is mostly dense gravel.

**Stormwater Monitoring Summary:** 7.61 mg/L total recoverable iron

Benchmark Concentration: 5 mg/L total recoverable iron



# Likely source(s) of pollution:

The most likely source of contamination is the dismantling of the powerhouse during the demolition of the Allen Fossil Plant.

#### Action:

Additional BMPs will be implemented. TVA's demolition contractor will place check dams/filter fabric in drains discharging to F7 where work is ongoing. TVA will evaluate the effectiveness of additional BMPs under normal sampling frequency. TVA will continue to perform quarterly visual inspections and annual monitoring at the outfall.

## Stormwater Outfall F9 (Sector O)

Stormwater from the Powerhouse area & Northwest Powerhouse Area as well as water from the sluice line trench ditches

The drainage area for F9 is 7.5 acres and receives the drainage from the former fossil plant, which is being demolished. The area is mostly dense gravel.

Stormwater Monitoring Summary: 8.68 mg/L total recoverable iron

Benchmark Concentration: 5 mg/L total recoverable iron

## Likely source(s) of pollution:

The most likely source of contamination is the dismantling of the powerhouse during the demolition of the Allen Fossil Plant.

#### Action:

Additional BMPs will be implemented. TVA's demolition contractor will place check dams/filter fabric in drains discharging to F9 where work is ongoing. TVA will evaluate the effectiveness of additional BMPs under normal sampling frequency. TVA will continue to perform quarterly visual inspections and annual monitoring at the outfall.

Unless otherwise requested, this letter will serve as both the 30-day and 60-day correspondence as noted in Part C of the General Conditions of the TN Multi-Sector General Permit. If you have any questions or need additional information, please contact DeAnne Hardy, Regional Environmental Manager. She can be reached at (901) 789-8862.

I certify under penalty of law that this document and all of its attachments were prepared under my direction or my supervision in accordance with a system designed to assure qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Sincerely,

ALF Site Manager