

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

July 16, 2020

Mr. Vojin Janjic Department of Environment and Conservation Division of Water Resources William R. Snodgrass Tennessee Tower 312 Rosa Parks Avenue, 11th Floor Nashville, Tennessee 37243 Transmitted via email

Dear Mr. Janjic:

TENNESSEE DEPARTMENT OF ENVIRONMENT AND CONSERVATION (TDEC) – DIVISION OF WATER RESOURCES – PROPOSED TENNESSEE STORMWATER MULTI-SECTOR GENERAL PERMIT (TMSP)

The Tennessee Valley Authority (TVA) appreciates the opportunity afforded by TDEC to review and comment on the proposed extension of the TMSP. 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 in this regard:

- 1. TVA supports TDEC's decision to extend the current permit for a period of two years while the Environmental Protection Agency finalizes their Multi-Sector General Permit.
- Because the Division is reissuing the 2015 TMSP without change, TVA requests that Notices
 of Coverage for existing facilities discharging under the permit should automatically be
 extended without the need to submit a new Notice of Intent.
 (Reference section 2.1.1. of the existing permit.) This could be accomplished by issuing a
 waiver as part of the final rule.

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 me at (865) 617-6226, or mckoroa@tva.gov.

Sincerely,

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M. Carolyn Koroa Director Environment and Energy Policy