

May 10, 2005

Mr. Larry F. Cook, Jr.
Environmental Field Office Manager
Knoxville Environmental Field Office
Division of Solid Waste Management
Tennessee Department of Environment
and Conservation
2700 Middlebrook Pike, Suite 220
Knoxville, Tennessee 37921-5602

TENNESSEE VALLEY AUTHORITY (TVA) – KINGSTON FOSSIL PLANT (KIF) –
HYDROGEOLOGIC EVALUATION OF COAL-COMBUSTION BYPRODUCT DISPOSAL
FACILITY EXPANSION (IDL 73-0094) – REQUEST FOR WAIVER

Dear Mr. Cook:

We are in receipt of your letter dated April 26, 2005 concerning review of the KIF Hydrogeologic Evaluation of Coal Combustion Byproduct Disposal Facility Expansion Report. The report contains detailed numeric modeling which demonstrates equivalent environmental protection by use of a 2-foot granular drainage blanket between the existing ash pond surface and the developed dredged cells in lieu of a constructed clay buffer. As part of this design, perimeter drains will be installed to collect and drain infiltration from the stack thereby preventing the development of destabilizing internal pore pressures and will also reduce flux to the upper most aquifer underlying the site.

The modeling effort indicates a very minor improvement in effective reduction of leachate migration to the underlying aquifer with the inclusion of a constructed clay barrier in the design. It is shown that far greater protection of groundwater is gained during the Post Closure Phase of the facility when a low permeable cap will be constructed which will further mitigate potential groundwater impacts across the disposal area.

Given this demonstration, and in accordance with Rule 1200-1-7-.01(5), we are requesting a waiver from Rule 1200-1-7-.04(4)(b) which would require a geologic buffer between the fill material and the existing ash disposal area. We are confident that following review of the technical presentation contained in the hydrogeologic report, you will be in agreement that in the case at KIF, the addition of a soil buffer between the existing ash disposal area and the overlying fill material would add minimal environmental protection to the design and that our request is justified.

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Page 2
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If you have any questions, please call Amos Smith at (423) 751-3522 or Linda Campbell at (865) 717-2157.

Gordon G. Park
Manager of Permitted Programs
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Tennessee Valley Authority, 1101 Market Street, Chattanooga, Tennessee 37402-2801

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