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cc: L. F. Campbell, KFP 1A-KST EDM, WT CA-K

ENVIRONMENTAL ASSISTANCE CENTER TENNESSEE DEPARTMENT OF ENVIRONMENT AND CONSERVATION

2700 MIDDLEBROOK PIKE, SUITE 220 KNOXVILLE, TENNESSEE 37921-5602

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January 20, 2004

Ms. Janet Watts Manager of Environmental Affairs Tennessee Valley Authority 1101 Market Street Chattanooga, Tennessee 37402-2801

RE: Proposed Minor Modification- Kingston Fossil Plant Landfill IDL 73-0094

Dear Ms. Watts:

The Division of Solid Waste Management has reviewed the proposed modification to the landfill's operation to allow an alternative waste placement mechanism. This modification has been reviewed in accordance with Rule Chapter 1200-1-7 Solid Waste Processing and Disposal. The request entails the addition of a dry hauling option for waste disposal into the cell at times when movement by wet slurry pumping poses some operational difficulty or is not desired. We find the revised waste movement mechanism meets the regulatory requirements, and we agree that this revision should be considered a minor modification. The Division hereby approves the request. Please retain this correspondence along with the initialed copy of your request as part of the facility's operation manual.

If you have any question concerning this correspondence, please call me at (865) 594-5474.

Yours truly,

Paula Plont

Environmental Protection Specialist

Division of Solid Waste Management

cc: Nashville Central Office—DSWM

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Tennessee Valley Authority, 1101 Market Street, Chattanooga, Tennessee 37402-2801

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APPRINED

January 6, 2004

Ms. Paula Plont
Division of Solid Waste
Knoxville EAC
2700 Middlebrook Pike, Suite 220
Knoxville, Tennessee 37921

TENNESSEE VALLEY AUTHORITY (TVA) - REQUEST FOR MINOR MODIFICATION - KINGSTON FOSSIL PLANT (KIF) IDL 73-0094

Dear Ms. Plont:

As you discussed with members of my staff, TVA seeks a minor modification of its Solid Waste Permit at KIF to facilitate the movement of ash into the permitted dredge when dredging is not possible. This modification would entail an additional sentence to be added to item (5) on page 6 of the closure plan originally submitted in September 1995. A revised page 6 is enclosed.

If you have questions concerning this correspondence, please call Larry C. Bowers at (423) 751-4947 in Chattanooga.

Sincerely,

Janet K. Watts

Manager of Environmental Affairs

5D Lookout Place

Enclosure

cc: Mr. Glen Pugh Solid Waste Section Division of Solid Waste Management 5th Floor, L&C Tower 401 Church Street Nashville, Tennessee 37243-1535

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- (3) The sluicing water continues on through the stilling pool before it is discharged into the river. Within the stilling pool the water is treated with lime as needed to control the pH.
- (4) The dredge cell dikes are constructed out of bottom ash material collected from the the bottom ash sluice channel. This ash is collected and transported by pans to the dredge cell area. Pans, dozers, backhoe/loaders, front-end loaders and dump trucks are then used to shape and construct the dikes in accordance with the drawings included with this plan.
- (5) During normal operation, material is then periodically dredged from the active ash pond and is hydraulically deposited to the interior of the dredge cell dikes. However, hydraulic dredging may not be possible or desired at all times and TVA will on occasion transport material to the dredge cell by other means including dipping and hauling.
- (6) The disposal process is an essentially continuous incremental procedure. No daily earth cover will be required. Intermediate cover may be placed in areas of the dredge cell dike that do not achieve final contours and vegetated during inactive phases of operation. The ash is physically stable, nonputrescible, and is not an attractant for disease or animal vectors.
- (7) The dredge cell side-slopes will continue at 3:1 with intermediate benches for erosion control and surface water drainage.
- (8) Dust is controlled by utilizing a water tank truck as required on the haul roads and dikes.
- (9) The ash disposal area dikes are formally inspected each spring.

2. Drainage System

The surface water drainage system will be operated with the same concepts as have proven to be historically successful during the operation of other TVA ash facilities.

The potential run-on from surrounding areas will continue to be intercepted in the existing diversion ditching network. The handling of this extraneous water assists in stormwater management and erosion control within the ash pond area.