



STATE OF TENNESSEE  
DEPARTMENT OF ENVIRONMENT AND CONSERVATION  
NASHVILLE, TENNESSEE 37243-0435

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February 13, 2020

**Via Electronic Mail to [ctfitzpatrick@tva.gov](mailto:ctfitzpatrick@tva.gov)**

Attn: Caitlin Fitzpatrick, NEPA Specialist  
Tennessee Valley Authority  
1101 Market Street, BR2C-C  
Chattanooga, Tennessee 37402

Dear Ms. Fitzpatrick:

The Tennessee Department of Environment and Conservation (TDEC) appreciates the opportunity to provide comments on the Tennessee Valley Authority (TVA) Pickwick Landing Dam (Pickwick Dam) First Utility District of Hardin County (FUDHC) Raw Water Line Relocation *Draft Environmental Assessment* (EA) in Hardin County, Tennessee.<sup>1</sup> The purpose of this project is to relocate the raw water intake line outside the construction limits of the Pickwick Dam upgrade project. This Draft EA addresses impacts related to the relocation of the raw water intake line including FUDHC obtaining a permanent easement from TVA, a Section 26a permit, and a temporary construction license. The FUDHC has a raw water intake line immediately upstream of the TVA Pickwick Dam south embankment. TVA has initiated a project to upgrade the Pickwick Dam related to the Pickwick Landing Dam South Embankment Seismic Upgrade Final EA that was completed in September 2016. The FUDHC raw water intake line is within the construction limits of the Pickwick Dam upgrade project. Actions considered in detail within the Draft EA include:

- **Alternative A – No Action Alternative** – Under the No Action Alternative, the FUDHC would not relocate the raw water line from the construction limits of the TVA improvements and the line would remain in place, an easement would not be granted, a 26a permit would not be issued, and a temporary construction license would not be needed. If the existing line is damaged during construction, the FUDHC would not have a reliable water supply for 2,500 residential and industrial customers. The FUDHC has a single water intake line. Without a reliable water supply source, the FUDHC would need to purchase water from other systems until repairs to the line could be made or the line could be relocated. Repairs or relocations could result in limited water availability and delays as a result of permits, right of way, or construction activities. Additionally, connections to other systems may not provide the capacity to meet Hardin County's needs. According to TVA, for these reasons, the No Action Alternative does not meet the purpose and need of the project.

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<sup>1</sup> The FUDHC provides drinking water to approximately 2,500 customers in the southwestern corner of Hardin County, Tennessee.

- **Alternative B – Directionally Bored Intake Line** – Under this alternative, TVA would grant FUDHC a permanent easement lying parallel and contiguous with the Packaging Corporation of America (PCA) 1.91-acre intake line easement within Pickwick Reservoir. A Section 26a permit and temporary construction license would also be issued. The proposed installation method would be to directionally bore a new 30-inch intake line underground from a point on land above the summer pool elevation and into the lake near the north boundary of the proposed easement west of PCA’s intake structure. A stainless steel intake screen and associated piping would be connected to the end of the 30-inch intake line. The intake screen and piping assembly would be supported on a structural steel assembly supported by H-piles or micro piles driven into the overburden of the lake bottom.

A 3-inch airline would be laid from the pump station to the intake screen assembly to provide means for removing sediment and debris from the intake screen slots using an air burst cleaning system. The airline would be installed in a shallow trench along the bottom of the lake and weighted down with suitable collars to prevent floatation. The intake screen, support system, and 3-inch airline would be constructed using divers and applicable construction equipment on portable barges. A flanged access connection assembly is proposed at each end of the directionally bored pipe. The existing intake line and screen assembly would be abandoned in place following completion of the new intake line and screen assembly. All earth and sediment displaced from the lake bottom by construction activities, including the directional boring, would be redistributed under the influence of gravity within the confines of the lake and not removed from the lake.

- **Alternative C – Conventionally Excavated Intake Line** – Under this alternative, TVA would permit and grant FUDHC a permanent easement lying parallel and contiguous with the PCA 1.91-acre intake line easement within Pickwick Reservoir. A Section 26a permit and temporary construction license would also be issued. The proposed installation method of a new line and screen would be a combination of construction techniques including both conventional excavation and supporting the remaining pipe segments on structural steel cross members supported by H-piles or micro piles driven into the overburden of the lake bottom. The existing intake line and screen assembly would be abandoned in place following completion of the new intake line and screen assembly.

All earth and sediment displaced from the lake bottom by construction activities, including the directional boring, would be redistributed under the influence of gravity within the confines of the lake and not removed from the lake.

TDEC has reviewed the Draft EA and provides the following comments:

### **Cultural and Natural Resources**

TDEC believes the Draft EA adequately addresses potential impacts to cultural and natural resources within the proposed project area.<sup>2</sup>

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<sup>2</sup> This is a state-level review only and cannot be substituted for a federal agency Section 106 review/response. Additionally, a court order from Chancery Court must be obtained prior to the removal of any human graves. If human remains are encountered or accidentally uncovered by earthmoving activities, all activity within the immediate area must cease. The county coroner or medical examiner, a local law enforcement agency, and the state archaeologist’s office should be notified at once (Tennessee Code Annotated 11-6-107d).

## **Air Resources**

TDEC recommends that TVA provide discussion regarding how emissions from gasoline and diesel fueled trucks and construction equipment used on- and off-site are expected to be minimized through the use of proper maintenance, new emissions control technologies, and fuels along with the minimization of unnecessary heavy duty vehicle idling.

## **Solid Waste**

TDEC recommends that the Final EA consider and explicitly reflect that any wastes associated with such activities in Tennessee be managed in accordance with the Solid and Hazardous Waste Rules and Regulation of the State of Tennessee (TDEC DSWM Rule 0400 Chapters 11 and 12, respectively).

## **Water Resources**

FUDHC is a stand-alone system with no alternate source of water and is not connected to any other utility which could supply water. Protection of the FUDHC system during construction and transition will be extremely important. The Draft EA does point to floating silt barriers or turbidity curtains, which will be essential tools. At crucial staging events, TVA should work with FUDHC to ensure that they maintain full tank levels as much as possible in case the water plant would have to shut down. TDEC encourages TVA to work with FUDHC to update their emergency response plan to address potential threats/risks during construction and transition, and for TVA to include additional discussion relating to these considerations in the Final EA.

TDEC appreciates the opportunity to comment on this Draft EA. Please note that these comments are not indicative of approval or disapproval of the proposed action or its alternatives, nor should they be interpreted as an indication regarding future permitting decisions by TDEC. Please contact me should you have any questions regarding these comments.

Sincerely,



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