March 3, 2021

Via Electronic Mail to aapilakowski@tva.gov
Attn: Ashley Pilakowski, NEPA Specialist
Tennessee Valley Authority
400 West Summit Hill Drive, WT 11B
Knoxville, TN 37902

Dear Ms. Pilakowski:

The Tennessee Department of Environment and Conservation (TDEC) appreciates the opportunity to provide comments on the Tennessee Valley Authority (TVA) Draft Environmental Assessment (EA) for the proposed retirement of Combustion Turbine (CT) Units 1-20 at TVA’s Allen Reservation in Memphis, Tennessee, and CT Units 1-16 at TVA’s Johnsonville Reservation in New Johnsonville, Tennessee, and the construction and operation of three new natural gas-fueled frame CT units (750 megawatt [MW] total) at TVA’s Paradise Reservation in Drakesboro, Kentucky, and three natural gas-fueled frame CT units (750 MW total) at TVA’s Colbert Reservation in Tuscumbia, Alabama, for a system total of 1,500 MW to replace the capacity lost as a result of retiring Allen and Johnsonville CTs. Additionally, TVA’s proposed action would result in the need for upgrades to the existing natural gas supply as well as actions to connect the CT plants to TVA’s existing transmission system, including transmission line (TL) network upgrades.1

Actions considered in detail within the Draft EA include:

- **Alternative A – No Action Alternative.** Under Alternative A, TVA would not retire CT Units 1-20 at Allen or CT Units 1-16 at Johnsonville. These units would continue to operate as part of the TVA generation portfolio. In order for the existing units to remain operational, additional repairs and maintenance would be necessary in the future to maintain reliability. Any repairs proposed to the existing CTs would be evaluated under a separate NEPA review as needed.

- **Alternative B – Retirement of Allen CT Units 1-20 and Johnsonville CT Units 1-16 and Construction of CT Units at Paradise and Colbert.** Under Alternative B, TVA would retire CT Units 1-20 at Allen and CT Units 1-16 at Johnsonville. However, TVA would retain a few Allen CT units (about 80 MW) for emergency regional black start purposes until a suitable alternative is in place. Although the specific units to be retained have not been identified, they would only be used for

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1 Preliminary project scoping identified approximately 10 TLs, two for Paradise and eight for Colbert, which would require network upgrades. TVA separated these TL upgrades into two categories: TL upgrades that must be complete prior to the new CT plants in-service date on TVA’s system and other impacting projects (two TLs for Paradise and four TLs for Colbert), and TL upgrades that may be completed, as and if necessary, after the CT plants are in service (four TLs for Colbert).
emergency purposes and would not be considered part of TVA’s normal operational system. In order to replace the capacity lost as a result of retiring the Allen and Johnsonville CTs, TVA would construct and operate three new natural gas-fueled frame CT units (750 MW total) at Paradise and three natural gas-fueled frame CT units (750 MW total) at Colbert for a system total of 1,500 MW. Actions associated with implementation of this alternative are described in the Draft EA document starting on page 9.

TDEC has reviewed the Draft EA for activities occurring in Tennessee and has the following comments regarding the proposed action and its alternative:

**Cultural Resources**

TDEC believes the Draft EA adequately addresses potential impacts to cultural resources within the proposed project area.²

**Air Resources**

As it relates to TL construction and other activities occurring in Tennessee, TDEC recommends the use of best practices to minimize the generation of fugitive dust, open burning be kept to a minimum, regulatory requirements pertaining to asbestos be followed, and that all construction equipment be well-maintained and equipped with the latest emissions control equipment.

Tennessee Air Pollution Control Regulation (TAPCR)³ provides specific requirements for prevention of fugitive dust, including use, where possible, of asphalt, water, or suitable chemicals to limit its creation. TDEC encourages TVA to include these considerations in the Final EA.

TDEC has open burning regulations⁴ and the Division of Air Pollution Control would need to be contacted prior to any open burning of any vegetative or construction/demolition related debris generated from the project. TDEC encourages TVA to include these considerations in the Final EA.

If any structures in Tennessee will be demolished, an asbestos demolition notification must be provided in advance, and proper pre-demolition surveys need to be conducted to identify any regulated asbestos containing materials (ACM) present.⁵ Prior to any demolition, all facilities must be examined for ACM and all potential ACM in the buildings proposed for demolition must be handled and disposed of according to the applicable federal, state, and local regulations. TDEC encourages TVA to include these considerations in the Final EA.

**Solid Waste**

Chapter 3 Section 17 outlines the effects of the proposal with respect to solid and hazardous wastes, both of which will be generated throughout construction, installation, operation, maintenance, and decommissioning activities. TDEC recommends that the Final EA consider and explicitly reflect that all wastes generated during the proposed

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² 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).


⁵ Reference TDEC TAPCR 1200-03-11-.02, [http://sos.tn.gov/effective-rules](http://sos.tn.gov/effective-rules) which includes requirements for structures potentially contaminated with asbestos.
activities be managed in accordance with the Solid and Hazardous Waste Rules and Regulations of the state (TDEC DSWM Rule 0400 Chapters 11 and 12, respectively) in addition to other potentially applicable regulations (federal, state, and TVA best management practices and standard mitigation measures).

With respect to hazardous waste generator categories, depending on the volume produced and/or amount accumulated/stored in a calendar month, there are various requirements pertaining to hazardous waste management. Such requirements include but are not limited to waste identification and notification, satellite accumulation areas, container storage requirements, preparedness & prevention measures, used oil management, universal waste management, recordkeeping and reporting, personnel training, and emergency response requirements. TDEC encourages TVA to include these considerations in the Final EA.

**Water Resources**

Based on review of the Draft EA, TL replacements and modifications in Hardin, Lawrence, Montgomery, Sumner, Wayne, and Wilson Counties in Tennessee will likely involve multiple stream crossings, necessary for the work to be done. As noted by TVA in the Draft EA, activities with potential to impact streams in Tennessee will require an Aquatic Resource Alteration Permit (ARAP). TDEC concurs with the Draft EA that TL-related activities are also expected to disturb more than one acre of land and require a construction stormwater general permit (CGP) including a Surface Water Pollution Prevention Plan (SWPPP).

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 of future permitting decisions by TDEC. Please contact me should you have any questions regarding these comments.

Sincerely,

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