



Stantec Consulting Services Inc.
1409 North Forbes Road, Lexington KY 40511-2024

October 5, 2016
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Revision 0

Tennessee Valley Authority
1101 Market Street
Chattanooga, Tennessee 37402

**RE: Initial Hazard Potential Classification Assessment
Gypsum Disposal Area
EPA Final Coal Combustion Residuals (CCR) Rule
TVA Paradise Fossil Plant
Drakesboro, Kentucky**

1.0 PURPOSE

This letter documents Stantec's certification of the initial hazard potential classification assessment for the TVA Paradise Fossil Plant's Gypsum Disposal Area. The EPA Final CCR Rule requires owners or operators of CCR surface impoundments to conduct initial and periodic hazard potential classification assessments of the unit, assign one of three potential hazard classification ratings to it, and provide the basis for the rating, as per 40 CFR 257.73(a)(2). Hazard potential classification ratings define the consequences in the event of a failure - *the ratings have nothing to do with the likelihood of failure or the structural stability of the impoundment*. Based on this assessment, the Gypsum Disposal Area has been assigned a significant hazard potential classification rating.

2.0 BASIS FOR CLASSIFICATION RATING

As described in the attached assessment report, the hazard potential classification rating of "significant" was assigned to Gypsum Disposal Area because a failure or mis-operation would result in no probable loss of human life, but could cause economic loss, environmental damage, disruption of lifeline facilities, or impact other concerns. In 2013, an assessment was completed. Riverside Road downstream was identified as potentially impacted during a breach. No other structures or critical infrastructure were identified within the flow paths resulting from potential breach scenarios reviewed. Loss of life was considered improbable due to the intermittent use of the road and transient nature of persons entering this area. However, a breach could result in off-site release of CCRs. Review of the 2013 analysis and current conditions at the Gypsum Disposal Area concluded that the existing hazard classification is applicable.

3.0 SUMMARY OF FINDINGS

The attached report presents the analysis for the initial hazard potential classification assessment. The results demonstrate that the impoundment meets the hazard potential classification of "significant."



October 5, 2016
Page 2 of 2

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TVA Paradise Fossil Plant
Drakesboro, Kentucky**

4.0 QUALIFIED PROFESSIONAL ENGINEER CERTIFICATION

I, John S. Montgomery, being a Professional Engineer in good standing in the Commonwealth of Kentucky, do hereby certify, to the best of my knowledge, information, and belief:

1. that the information contained in this certification is prepared in accordance with the accepted practice of engineering;
2. that the information contained herein is accurate as of the date of my signature below; and
3. that the initial hazard potential classification assessment for the TVA Paradise Fossil Plant's Gypsum Disposal Area meets the requirements specified in 40 CFR 257.73(a)(2).

SIGNATURE

DATE October 5, 2016

ADDRESS:

Stantec Consulting Services Inc.
1409 North Forbes Road
Lexington, Kentucky 40511-2024

TELEPHONE:

(859) 422-3000

ATTACHMENTS:

Initial Hazard Potential Classification Assessment



Initial Hazard Potential Classification Assessment

Paradise Fossil Plant – Gypsum
Disposal Area
Drakesboro, Kentucky



Prepared for:
Tennessee Valley Authority
Chattanooga, Tennessee

Prepared by:
Stantec Consulting Services Inc.
Lexington, Kentucky

October 5, 2016
Revision 0

Table of Contents

1.0	RATING	1
2.0	BASIS OF RATING	2
2.1	INTRODUCTION.....	2
2.2	SOURCE DATA	2
2.3	POTENTIAL FAILURE SCENARIOS	2
2.4	HAZARD CLASSIFICATION	3
3.0	REFERENCES	4
APPENDIX	SITE OVERVIEW FIGURE	

INITIAL HAZARD POTENTIAL CLASSIFICATION ASSESSMENT

Rating
October 5, 2016

1.0 RATING

This report documents the Hazard Potential Classification Assessment for the Gypsum Disposal Area at Paradise Fossil Plant (PAF) as required per the Hazardous and Solid Waste Management System; Disposal of Coal Combustion Residuals from Electric Utilities [RIN-2050-AE81; FRL-9149-4] (EPA Final CCR Rule) § 257.73 (a)(2). Hazard potential classifications are based on the consequences of failure or mis-operation and are not a measure of the condition of the unit. The applicable hazard potential classifications are defined in the EPA Final CCR Rule § 257.53 as follows:

- (1) High hazard potential CCR surface impoundment means a diked surface impoundment where failure or mis-operation will probably cause loss of human life.
- (2) Significant hazard potential CCR surface impoundment means a diked surface impoundment where failure or mis-operation results in no probable loss of human life, but can cause economic loss, environmental damage, disruption of lifeline facilities, or impact other concerns.
- (3) Low hazard potential CCR surface impoundment means a diked surface impoundment where failure or mis-operation results in no probable loss of human life and low economic and/or environmental losses. Losses are principally limited to the surface impoundment owner's property.

Based on these definitions the Gypsum Disposal Area is classified as a significant hazard potential CCR surface impoundment.

This report contains supporting documentation for the Hazard Potential Classification Assessment. The hazard potential classification for this structure was determined by review of a previous assessment conducted by Stantec in September, 2013.

INITIAL HAZARD POTENTIAL CLASSIFICATION ASSESSMENT

Basis of Rating
October 5, 2016

2.0 BASIS OF RATING

2.1 INTRODUCTION

The Tennessee Valley Authority (TVA) has contracted Stantec Consulting Services Inc. (Stantec) to review and update previous Hazard Potential Classification Assessments as needed and to prepare the accompanying certification for selected impoundments at various TVA Plants.

PAF is located in Muhlenberg County, Kentucky. The plant is located adjacent to the Green River, approximately 50 miles northwest of Bowling Green, KY. The Gypsum Disposal Area ultimately discharges into the Green River via the Peabody Ash Pond. A site overview figure is included in the appendix.

2.2 SOURCE DATA

The Gypsum Disposal Area was included as part of an assessment previously conducted in 2013. Stilling Pond 1 was considered in that study along with the Gypsum Stilling Pond 1 and Gypsum Disposal Area Stilling Pond 2 as a single system which was referenced in the report as "Scrubber Sludge Complex". Based on the findings, it was recommended that the hazard classification of the "Scrubber Sludge Complex", including the Gypsum Disposal Area, be listed as a significant hazard.

2.3 POTENTIAL FAILURE SCENARIOS

It was noted in the 2013 study that a breach of the "Scrubber Sludge Complex" could possibly cause a secondary breach of the Peabody Ash Pond due to the inflow volume of water and gypsum. It was also noted that a breach of the Peabody Ash Pond would likely result in flow through the culverts at Riverside Road potentially impacting the road. It was determined that this was a local road, was intermittently used and the at-risk populations were considered transient. Therefore, loss of life from a breach of the impoundment was not envisioned. However, a breach could result in off-site release of CCRs.

As part of this initial hazard classification assessment, site conditions were reviewed to determine if changes have occurred to the impoundment or to downstream areas that would affect the conclusions of the 2013 study. No significant changes have been identified and it is concluded the hazard classification determination is appropriate.

INITIAL HAZARD POTENTIAL CLASSIFICATION ASSESSMENT

Basis of Rating
October 5, 2016

2.4 HAZARD CLASSIFICATION

Findings of this review and assessment demonstrate that a breach of the impoundment results in no probable loss of human life, but could cause economic loss or environmental damage. It is Stantec's opinion the impoundment fits the definition for a significant hazard potential CCR surface impoundment (as defined in the EPA Final CCR Rule §257.53).

INITIAL HAZARD POTENTIAL CLASSIFICATION ASSESSMENT

References
October 5, 2016

3.0 REFERENCES

1. Stantec, September 30, 2013. Dam Safety Hazard Classification Projects Summary Report.
2. Hazardous and Solid Waste Management System; Disposal of Coal Combustion Residuals from Electric Utilities [RIN-2050-AE81; FRL-9149-4]. April, 2015.

APPENDIX SITE OVERVIEW FIGURE

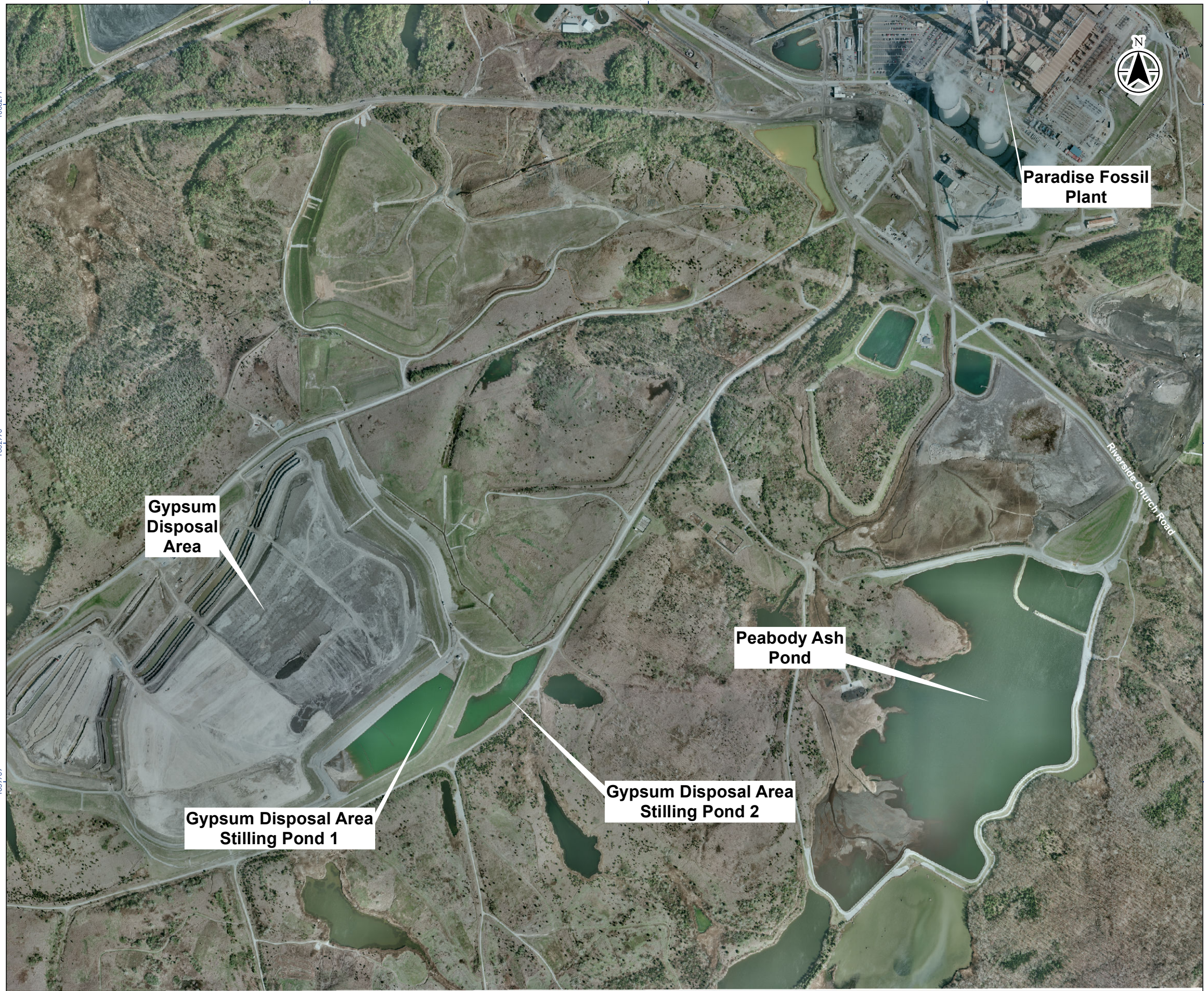
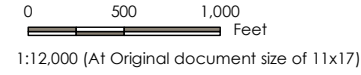


Figure No. **1**
 Title **Site Overview
 PAF - Gypsum Disposal Area**
 Client/Project
 Tennessee Valley Authority
 Paradise Fossil Plant (PAF)
 Hazard Potential Classification Assessment
 Project Location: Muhlenberg County, Kentucky
 Prepared by: BSJ on 2015-06-29
 Technical Review by: AWG on 2016-09-30
 Independent Review by: WRM on 2016-09-30



Notes
 1. Coordinate System: NAD 1983 StatePlane Tennessee FIPS 4100 Feet
 2. TVA Aerial Imagery Dated 2016.
 3. State boundaries produced by ESRI, U.S. Department of Commerce, U.S. Census Bureau.



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