



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
Slag Ponds 2A and 2B
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 Slag Ponds 2A and 2B. 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, Slag Ponds 2A and 2B have 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 Slag Ponds 2A and 2B 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. The 2013 study reported no structures or critical off-site infrastructure were positioned within the immediate flow paths of the potential breach scenarios reviewed. Buildings and roadways within the vicinity of the impoundment were found to be either positioned above the elevation of the impoundment or separated by conveyance paths which would divert potential breach flows. Therefore, loss of human life from a breach of the impoundment was not envisioned. However, because Slag Ponds 2A and 2B are bordered by the Green River, a breach would likely result in the off-site release of CCRs into the waters of the United States. Review of the analysis and current conditions at Slag Ponds 2A and 2B concluded that the existing hazard classification was applicable.



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**RE: Initial Hazard Potential Classification Assessment
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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."

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 Slag Ponds 2A and 2B 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 – Slag Ponds
2A and 2B
Drakesboro, Kentucky



Prepared for:
Tennessee Valley Authority
Chattanooga, Tennessee

Prepared by:
Stantec Consulting Services Inc.
Lexington, Kentucky

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INITIAL HAZARD POTENTIAL CLASSIFICATION ASSESSMENT

Rating
October 5, 2016

1.0 RATING

This report documents the Hazard Potential Classification Assessment for Slag Ponds 2A and 2B 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 Slag Pond 2A and 2B are 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. Slag Ponds 2A and 2B are located north west of the power plant. A site overview figure is included in the appendix.

2.2 SOURCE DATA

For Slag Ponds 2A and 2B, an assessment was previously conducted in 2013. Based on the findings, it was recommended that the hazard classification of Slag Ponds 2A and 2B be listed as a significant hazard.

2.3 POTENTIAL FAILURE SCENARIOS

The 2013 study reported no structures or critical infrastructure were positioned within the immediate flow paths of the potential breach scenarios reviewed. Buildings and roadways within the vicinity of the impoundment were found to be either positioned above the elevation of the impoundment or separated by conveyance paths which would divert potential breach flows. Therefore, loss of human life from a breach of the impoundment was not envisioned. However, because Slag Ponds 2A and 2B are bordered by the Green River, a breach would likely result in the off-site release of CCRs into the waters of the United States.

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

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

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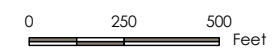
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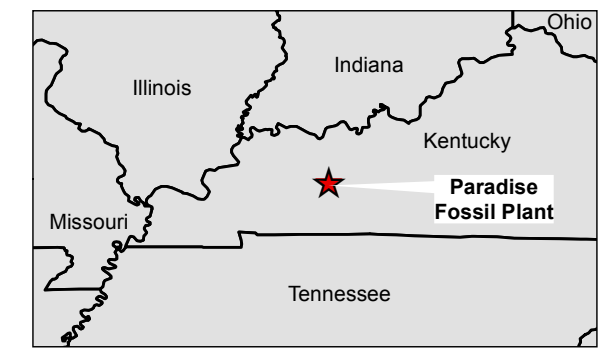
Site Overview PAF - Slag Ponds 2A and 2B

Client/Project
Tennessee Valley Authority
Paradise Fossil Plant (PAF)
Hazard Potential Classification Assessment

Project Location: Muhlenberg County, Kentucky
Prepared by: B.S.J. on 2015-06-29
Technical Review by: A.W.G. on 2016-09-30
Independent Review by: W.R.M. on 2016-09-30



1:6,000 (At Original document size of 11x17)



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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