

Appendix A – Response to Comments Received on the Draft EIS

Appendix A – Public and Agency Comments Received on the Draft EIS and TVA's Response to Comments

TVA provided opportunities for the public and agency input into the proposed action throughout the decision making process. This process included:

- TVA conducted a Lunch and Learn with local officials on Friday, April 17, 2015 to introduce the project.
- Scoping – On May 21, 2015, TVA published a Notice of Intent (NOI) in the Federal Register to prepare an Environmental Impact Statement (EIS). The NOI initiated a public scoping period, which concluded on July 6, 2015. In addition to publication of the NOI in the Federal Register, TVA published notices regarding this effort in regional and local newspapers; issued a news release to media; posted the news release on the TVA website; and posted flyers and signs near the proposed landfill site to solicit public input. TVA also sent copies of the NOI to the Tennessee Department of Environmental and Conservation and the United States Department of Interior.
- Draft EIS - The Draft EIS was released for comment on May 20, 2016, and a notice of availability including a request for comments on the Draft EIS, was published in the Federal Register on May 27, 2016. TVA's public and agency involvement for this Draft EIS included a public notice and a 45-day public review of the Draft EIS. The Draft EIS was posted on TVA's Web site and hard copies were available by request. To solicit public input, the availability of the Draft EIS was announced in regional and local newspapers and a news release was issued to the media and posted to TVA's Web site. In addition, TVA mailed postcard notifications to all residents within a 1-mi radius of the plant (311 addresses). The postcards announced the availability of the EIS and requested comments. TVA's agency involvement included sending letters to local, state and federal agencies and federally recognized tribes to notify them of the availability of the Draft EIS. The public comment period closed on July 12, 2016. The US EPA requested a two-week extension, which TVA approved.

TVA received 12 comment submissions, which included letters, e-mails and submissions through the project Web site. The comment submissions were carefully reviewed and synthesized into comment statements. These comments and TVA's responses are provided below.

General Comments

1. Comment: Request that response to all comments submitted concerning this EIS be made public for review before the EIS is finalized. (*Commenter: Will Kegley*)

Response: Responses to all substantive comments are included in this final EIS. The notice of availability of the final EIS will be published in the Federal Register and the publication begins the minimum 30-day wait period. TVA will not make a final decision on a proposed action until after the 30-day wait period has ended.

2. Comment: Strongly support TVA's transition to dry ash storage at its coal combustion power plants. (*Commenter: US Department of Interior*)

Response: Comment noted.

Purpose and Need

3. Comment: The EPA found the References section and the Related Environmental Reviews section of the DEIS electronic links to each of the TVA's and TVA contractors' (e.g., URS 2011) documents cited are not working and should be corrected and provided in the FEIS. This information is important for understanding many of the assumptions stated in this document that are based on previous studies, such as the assumption of 20-year time horizon for fuel-generated power at BRF. (Commenter: USEPA)

Response: Hyperlinks to TVA documents or TVA subcontractor documents were not provided in either section of the EIS. Most TVA documents are available on the TVA website or, if archived, would be available upon request

4. Comment: The EPA also requests that additional information be provided in the FEIS should there be hydrologic connection between existing groundwater contamination at Area 2 Fly Ash Pond and the future new landfill. (Commenter: USEPA)

Response: Comment noted. As identified in the Final Programmatic EIS Part II, – Site Specific NEPA Review: Bull Run Fossil Plant, TVA will implement any supplemental mitigation measures required pursuant to a unilateral administrative order that TDEC issued in August 2015, which could include additional monitoring, assessment, or corrective action programs.

The proposed landfill is located to the north of Bull Run Ridge and the Area 2 Fly Ash Pond is located to the south of Bull Run Ridge. These two areas are hydrologically separated by the ridge and the geology is significantly different. In addition, groundwater levels beneath the site vary on the two sides of Bull Run Ridge. Groundwater near the Area 2 Fly Ash Pond, to the south of the ridge, is first encountered within sand and gravel layers in the alluvial deposits. To the north of the ridge, however, groundwater is first encountered in fractures within the bedrock. The Area 2 Fly Ash Pond is not adjacent to and is some distance away from the proposed new landfill. Therefore, a hydrologic connection between these two facilities is not anticipated.

5. Comment: The EPA is also concerned that the J area landfill might fail to satisfy the 20-year disposal capacity for the BRF operational timeline (whereas the Chestnut Ridge Sanitary Landfill would potentially satisfy more than twice the projected disposal capacity). Section 2.2.2 of the DEIS states: *"The landfill would provide approximately 15.5 years of disposal capacity based on current estimated consumption rates."* The EPA notes, however, that Table 2-1 indicates that the life span of the J area Landfill is estimated at 12 years. This is less than the 20-year time horizon for which the additional disposal capacity for the BRF Plant is planned. The EPA recommends that these potential inconsistencies be addressed in the FEIS and any other plans that might be under consideration to meet the 20-year disposal capacity objective. (Commenter: USEPA)

Response: As outlined in the 2015 Integrated Resource Plan, TVA needs 20-years of disposal capacity for the BRF operational timeline. This time period includes the disposal capacity already present onsite. As discussed in the Purpose and Need, Section 1.2, TVA's current landfill will be expended within 10 years, which leaves around 10 years of disposal capacity that Site J will be able to provide. This would meet the estimated long term disposal needs of CCR at BRF and, therefore, the Purpose and Need of the proposed action. As noted in the footnote on Table 2-1, the life span of each of the proposed alternatives was obtained from initial siting studies. Capacity was based on production rates at the time of those studies. The disposal capacity of Site J (15.5 years) cited in Section 2.2.2 of the DEIS represents current (refined) estimated energy production and consumption rates. Table 2-1 has been clarified with an additional footnote indicating that the earlier value used in the preliminary siting study has been refined.

The estimated life span of the Chestnut Ridge Landfill as shown on Table 2-1 is also based on preliminary estimates of landfill capacity. These estimates, however, do not account for the need to accommodate waste from other clients, which would reduce the estimated life span of the landfill.

6. Comment: The EPA recommends that the TVA consider a clearer discussion concerning the selection of the closing-in-place alternative for all the ten ponds, including the Fly Ash Pond and Sluice Channel at the BRF, in the FEIS. The TVA may wish to clarify a potential discrepancy between the options selected for consideration for increasing the future disposal capacity of CCR, as required by the decision to continue operating the BRF, and response# 34 in Appendix A of the Final Programmatic Pond Closure EIS where the TVA stated that there is no more on-site space for a landfill that could accommodate the CCR removed from the site's two ponds. (*Commenter: USEPA*)

Response: Closure of the Fly Ash Pond and Sluice Channel were addressed in the Final Programmatic EIS Part II – Site Specific NEPA Review: Bull Run Fossil Plant and these closures are identified as reasonably foreseeable future actions in the current EIS. TVA feels no further analysis of closure of these facilities is warranted. As stated in response to Comment 34 in Appendix A of the Final Programmatic Impoundment Closure EIS, landfills that are currently operating (e.g., Bull Run and Kingston Fossil Plants), are planned to receive operation-related CCR and as such, no capacity exists to accommodate legacy ash from the impoundments on the site in addition to production ash from future operations.

Alternatives

7. Comment: The stated rationale for the selection of the onsite J Area for the construction of a new CCR landfill (the preferred alternative) versus using the Chestnut Ridge Stage I RCRA-D landfill is somewhat unclear and the criteria evaluated does not appear to be fully explained. For example, the EPA found from the review of the DEIS that the Chestnut Ridge Landfill has a higher preliminary score and does not require new permits. From Table 2-2 (page 11), the Chestnut Ridge Landfill scored better (52) than the J Area landfill site (59). The Chestnut Ridge Landfill is an existing, permitted landfill that has sufficient capacity to meet the need for long-term storage of CCR generated at the BRF. The primary impacts identified in the screening analysis were related to the cost and impacts associated with the transportation of CCR from the BRF to the Chestnut Ridge Landfill site. To the extent that the TVA anticipates tipping fees charged for disposing at the Chestnut Ridge Landfill (whereas disposal at the J Area CCR Landfill would not entail tipping fees), this should be also clearly identified in the FEIS. (*Commenter: USEPA*)

Response: As discussed in Section 2.1.1, TVA performed a site screening study that scored nine different sites against 34 environmental and engineering factors in four general categories: natural environment, geology, human environment, and engineering and transportation considerations. TVA's Alternative Site Screening Analysis explains that the Chestnut Ridge landfill received the best score because as an existing, permitted landfill, its use would result in fewer impacts to the natural environment, geology, human environment, or engineering. The impacts of the Chestnut Ridge alternative are, therefore, limited primarily to those associated with the transportation of CCRs from BRF to Chestnut Ridge. Site J received the next best score. Although based on this initial screening Site J has a greater environmental impact than the Chestnut Ridge Landfill, TVA prefers Site J because it would avoid the off-site transport of CCR along public roads. Based on estimates of CCR production, 100 truckloads per day throughout the life of the landfill (estimated at 15.5 years) would be needed to transport CCR to the offsite landfill. The selection of Site J would reduce air emissions, safety risks and

disruptions to the public that would be associated with such off-site transport. TVA has clarified this rationale in Section 2.5 of the FEIS.

Additional detail regarding costs associated with the transport of CCR from BRF to the Chestnut Ridge Landfill is included in Appendix C of the FEIS. To estimate cost of transport, a haul rate of \$140 dollars per hour (cost of dump truck and operator) was assumed. The cost to transport CCR material was estimated based on the length of haul route, and the calculated travel time from BRF to each of the landfill sites (based on an assessment of posted speeds, road widths and road alignments). Given the location of Chestnut Ridge relative to BRF, the costs for transport were moderate. As noted in the Appendix, this option would incur costs related to a tipping fee to dispose of CCR materials, because Chestnut Ridge is a privately-owned landfill. Tipping fees have been estimated at approximately \$75 per ton of ash. This fee, together with the transportation cost, elevated the cost of this alternative significantly. Additional detail from the screening analysis has been added to the FEIS for clarity.

8. Comment: The transportation to Chestnut Ridge Landfill alternative is of course bogus and makes the selection of the preferred alternative of a new landfill adjacent to BRF justified as the only choice. Why did TVA not consider changing BRF or other TVA facility to natural gas that would preclude the need for additional environmental insult from the fly ash landfill and would reduce global warming pollutant output while producing the same amount of electricity?
(*Commenter: Will Kegley*)

Response: As noted in Section 1.2 of the FEIS and in the referenced IRP, BRF is one of the coal plants that TVA plans to continue operating in the future as part of its balanced approach to meet future demand for electricity. In 2011, TVA performed a Siting Study to evaluate suitable sites for constructing a landfill to manage CCR produced at BRF. TVA initially considered nine potential sites for new landfill construction and subsequently identified the off-site transport of CCR to an existing permitted landfill as a potential alternative for management of CCR at BRF. TVA then performed a screening study that scored these sites against 34 environmental and engineering factors in four general categories: natural environment, geology, human environment, and engineering and transportation considerations. Based on the extensive analysis of both on-site and off-site disposal options, and on the results of that screening study, TVA retained three alternatives to be carried forward for further study in the EIS: No Action, Construct and Operate a Landfill for Storage of CCR on TVA Property Adjacent to BRF (Site J), and Offsite Transport of CCR to an Existing Permitted Landfill (Chestnut Ridge).

9. Comment: Given the detrimental impact to the environment of burning coal, why did TVA not consider closing BRF and buying electricity from a cleaner source of energy (Nuclear or natural gas) from energy providers outside of TVA (*Commenter: Will Kegley*).

Response: As noted in Section 1.2 of the FEIS and in the referenced IRP, BRF is one of the coal plants that TVA plans to continue operating in the future as part of its balanced approach to meet future demand for electricity.

Beneficial Reuse

10. Comment: The DEIS does not identify the estimated quantity of CCR being utilized for beneficial use and the EPA requests that this information be provided in the FEIS. If no CCR is currently being utilized for beneficial use, the TVA might wish to identify its plans for developing future markets of CCR in the FEIS. (*Commenter: USEPA*)

Response: Beneficial reuse is considered by TVA as part of all ash management activities and TVA has an active marketing program to identify opportunities for the beneficial use of CCR. Any fly ash generated at BRF that meets specifications will be beneficially reused and TVA is

currently selling nearly 100% of the fly ash produced, with the exception being ash generated during startup and shutdown.

11. Comment: It would make more sense to get the reuse value back from a by-product. We also proposed to TVA a plan to dispose of Kingston Steam Plants Fly Ash back in March 17, 2009. I will forward this proposal in a separate email, TVA sure could have saved some monies. (*Commenter: Bill Evans*)

Response: Comment noted. See response to comment 10.

12. Comment: Suggest TVA consider Marketing and selling the ash to industry. (*Commenter: Carl Lovelace*)

Response: Comment noted. See response to comment 10.

13. Comment: This Bull Run Fossil Plant Landfill Draft Environmental Impact Statement is missing an Alternative. That alternative is to create as much disposal dry storage (landfill) to incorporate the clean closure of Bull Run's coal ash impoundments; utilizing the excavated coal ash as beneficial reuse backfill material with the creation of eMSE (Encapsulated Mechanically Stabilized Earthen) berms. (*Commenter: John Swenson*)

Response: A change in market conditions or new technologies may allow the evaluation of other alternatives for CCR management in the future. Should such an alternative technology be available and viable in the future, TVA would conduct a separate NEPA review to consider that alternative as appropriate. In addition, the proposed Site J landfill is as large as it can be given regulatory setback requirements and site topography; therefore, the placement of impoundment ash is not feasible and would negate the purpose and need.

Groundwater and Air Monitoring

14. Comment: The environmental impacts concerning the air quality and ground water of this ash landfill will be monitored correct? If so could you please tell me where the nearby neighbors can obtain this records and results? Also how frequently will these areas be tested? (*Commenter: Rodney Jennings*)

Response: The landfill will meet the requirements of a Class II Solid Waste facility as specified by TDEC, as well as the CCR Rule's requirements for new landfills which includes implementation of a groundwater monitoring program that includes the establishment of baseline conditions and, at a minimum, semiannual detection monitoring, the results of which will be posted to the TVA website at the following address: <https://www.tva.gov/Environment/Environmental-Stewardship/Coal-Combustion-Residuals>. The CCR rule also requires TVA to develop a fugitive dust plan with adequate dust control measures for this site. TVA will keep a log of citizen complaints about fugitive dust and has developed a fugitive dust hotline—1-800-TVA-DUST—where concerns regarding fugitive dust can be recorded. Every year TVA will prepare a report detailing the controls used, any citizen complaints received, and a summary of any corrective actions taken. Groundwater monitoring and fugitive dust control measures have been added to the list of mitigation measures in the FEIS.

15. Comment: Please include a description of the monitoring plan that will be employed to ensure that any breach in the landfill associated with Alternative B will be detected early so exposure to leachate or coal ash by humans and the environment can be minimized. Please note that nearly every landfill liner eventually fails and contaminates the groundwater even under the best practices described in the EIS. (*Commenter: Will Kegley*)

Response: Comment noted. See response to comment 14. Details of the monitoring plan will be developed in accordance with the CCR Rule and in conjunction with final permitting by TDEC.

Exposure to Ash

16. Comment: The EIS fails to address the protection to the environment and human health (residences and workers) from the exposure of toxic chemicals commonly found in fly ash (Pb, U, Hg, Se) from windblown, sediment transportation, landfill leachate reaching the water table, and direct contact. In addition to the landfill operation worker the other nearest human receptors for these toxins are in low income areas. How will TVA monitor and protect these residences from contact with fly ash? (*Commenter: Will Kegley*)

Response: The commenter's concerns are addressed in Section 2.2.2 of the Final EIS where TVA describes the liner and leachate collection systems that will collect leachate and pump it to the plant for treatment prior to discharge through a permitted, monitored outfall. In addition, Sections 3.1.2.2.1 and 3.1.2.2.2 discuss mitigation measures that TVA will use to reduce fugitive dust emissions during construction and operation of the landfill. TVA's management of leachate and fugitive dust, as well as its monitoring of groundwater, are regulated by TDEC's and EPA's CCR Rule's requirements for new landfills. TVA also will operate in accordance with all provisions outlined in the Solid Waste Disposal Class II Permit issued for this project.

17. Comment: The high Fe, Mn, and Sulfates detected in some of the groundwater monitoring wells (Page 43) are indicative of inadequate monitoring well installation and development. These baseline results will impact the ability to detect a breach in the landfill once operation begins. Please check the turbidity of the wells with these high concentrations and redevelop to at least 10 ntu and resample with four quarters of data to generate a proper baseline. (*Commenter: Will Kegley*)

Response: TVA installed the wells around the proposed landfill per state and federal requirements. The well network was redeveloped during the summer of 2016 and will be sampled for eight quarters of baseline groundwater data against which compliance monitoring will be benchmarked. The CCR Rule also requires a certification from a qualified professional engineer stating that the groundwater monitoring system has been designed and constructed to meet the CCR Rule's groundwater monitoring requirements. Sampling analysis and procedures and test methods will be established in the groundwater monitoring plan and TVA will adhere to requirements established in the CCR Rule and those established by TDEC. Groundwater monitoring requirements have been added to the list of mitigation measures in the FEIS.

18. Comment: The EIS should clearly state with cited peer reviewed journals the toxicity of coal's post combustion waste (aka ash). Because the EIS is intended to be a public communication tool it is essential that the public be completely informed on toxicity to human health of the material being placed in landfill as part of the preferred alternative. Concentrated chemicals in coal ash include arsenic, boron, chromium, lead, mercury, selenium, uranium, and zinc. In the event that the landfill best practices fail, the public has the need to know what they will be exposed to and under what pathways they may receive this exposure. Please include a human health risk assessment that will include the risk to coal ash exposure as mitigated by the best practices described in the EIS and also the risk of exposure under a breached landfill scenario where coal ash is exposed at the surface and available for direct exposure through air and sediment transport mechanisms. (*Commenter: Will Kegley*)

Response: Concern regarding improperly constructed or managed coal ash disposal units prompted EPA to implement the CCR Rule which enacts requirements designed to protect human health and the environment. Construction and operation of the proposed landfill will be in

accordance with TDEC requirements and requirements of the CCR Rule. The EIS included a thorough analysis of impacts to all environmental resources and factors including groundwater, drinking water, human health, flora and fauna. Based on the analysis presented in the EIS, none of the alternatives evaluated in the EIS is expected to have a significant impact on human health or the environment.

19. Comment: The steam plant is actually in view from my residence and community. I have several neighbors and a personal canine that have been diagnosed and are being treated for cancer, all within the last few years. Although the cancer instances could be coincidental, I'm not convinced that the cause isn't a result of the residence location of all involved. I do not feel that appropriate testing for cancer causing pollution introduced into the environment and local community are a consideration for local residents. I would appreciate any information on testing and findings of environmental pollutants introduced into the atmosphere not be taken lightly and be made public information. (*Commenter: Melisa Bartlett*)

Response: See comment above. The landfill will meet the requirements of a Class II Solid Waste facility as specified by TDEC and the CCR Rule's requirements for new landfills which includes monitoring that will be available via a TVA website.

20. Comment: Concerned about health effects of ash migrating to air and water. (*Commenter: Carl Scarbrough*)

Response: Comment noted. See Response to comment 16, 18 and 19.

Property Values

21. Comment: I am sure that this project will have a negative effect on the current worth of mine and my neighbors' homes and/or property values if we ever decided to sale and move elsewhere. I realize that TVA paid fair market value for the land and homes in order to put this landfill on, but there is not a doubt in my mind that our property values will be effected. What's TVA's plan for this? (*Commenter: Rodney Jennings*)

Response: The value of property is influenced by a number of factors such as location, physical amenities, and market conditions. The landfill would be constructed in an area that is proximate to an existing coal fired power plant and associated facilities to manage CCR including a landfill and ash impoundments. Therefore specific impacts to property values as a result of construction of the proposed landfill alone cannot be reliably determined.

22. Comment: Request TVA beautify Bull Run park, including rebuilding the fishing pier and provide walking and biking trails along Bull Run Creek. Also suggest adding a bike lane along New Henderson Road connecting Bull Run Park to the greater Claxton Community. These projects would improve TVA's image and help to mitigate loss of property values. (*Commenter: Mary Kate Cramer*)

Response: Comment noted. Impacts to the community would be minimized through onsite transport of CCR to the landfill as opposed to use of public roadways which reduces the potential for offsite noise and fugitive dust emissions, and reduces potential safety concerns due to increased vehicles on the roadways. In addition, TVA has planted a landscape visual screen which would help to minimize visual impacts. As impacts associated with the preferred alternative are primarily confined to the Bull Run Fossil Plant site, TVA does not see a need to provide additional amenities to address off-site impacts.

23. Comment: Suggest TVA implement a visual demarcation line to preserve property values. This would include several improvements to New Henderson Road and Old Blacksberry Lane, improving Bull Run Park, rebuilding the fishing pier on Bull Run Creek, adding trails and bike lanes and provide security to Bull Run Park and the fishing pier. (*Commenter: John Jenkins*)

Response: Comment noted. See response to comment 22.

24. Comment: The Alternative B (newly permitted landfill) for the disposal of the fly ash on the land adjacent to BRF will significantly degrade property values within the low income neighborhoods located in near proximity to the preferred alternative. What additional community investment will be planned and implemented by TVA to compensate for the economic and environmental justice issues of further penalizing near proximity low income neighborhoods who will suffer economic hardship with the selection of the preferred alternative? (*Commenter: Will Kegley*)

Response: An evaluation of the potential impacts to minority and low income communities is provided in Section 3.15 of the EIS. The results of that evaluation concluded that the community located on the south side of SR 170 (Edgemoor Road) just north of the proposed landfill site should be considered a sensitive population subject to environmental justice considerations. Due to the proximity of this community to the proposed landfill site (Site J) members of this community may be affected by the proposed action. Initial construction may result in short-term adverse effects to these residents associated with increased noise, exposure to fugitive dust, exhaust emissions, vibrations, increased traffic and generation of solid wastes. During operation, potential impacts to this community may include increased fugitive dust and noise emissions, and the landfill would present a visual impact. Dust control measures designed to meet permit requirements would be implemented and operational noise attenuates to acceptable levels at the nearby residential areas. The proposed landfill would be visible to nearby residents and motorists along local roads. Use of the landfill over its lifetime would result in the gradual increase in its height. In time, the proposed landfill would be similar in appearance to the existing dry fly ash stack and be screened to some extent by existing vegetation. Additionally, as illustrated in Figure 2-4 of the FEIS, TVA has clarified that all residences in the vicinity of the proposed landfill will be at least 500 ft from the proposed limit of waste, thereby minimizing impacts to sensitive populations. As stated in the EIS, one of the reasons TVA selected Alternative B is that this alternative avoids transport of CCR along SR 170 which would avoid the a long-term indirect impact to this community due to the additional traffic, noise and dust from the trucks transporting CCR to an offsite landfill. Under the preferred alternative, the haul road would be built on BRF property at an even greater distance from the potential EJ population (approximately 1,000 ft), and the transport of CCR to the landfill is not expected to result in adverse effects to this local EJ population. The location of the proposed haul road relative to the surrounding community has been further identified on Figure 2-3.

Public Meeting

25. Comment: Request a public meeting/forum to discuss concerns. Many people may overlook the simple post card that was provided. (*Commenter: Rodney Jennings*)

Response: TVA provided multiple opportunities for meaningful involvement to members of this community throughout the NEPA process for this project. Early in the process, as part of scoping for the EIS, TVA published a NOI on its website and in newspapers. TVA also posted flyers and signs near proposed landfill site to solicit public input. The Draft EIS was published in the Federal Register on May 27, 2016. TVA's public and agency involvement for this Draft EIS included a public notice and a 45-day public review of the Draft EIS. The Draft EIS was posted on TVA's Web site and hard copies were available upon request. To solicit public input, the availability of the Draft EIS was announced in regional and local newspapers and a news release was issued to the media and posted to TVA's Web site. In addition, TVA mailed postcard notifications to all within a 1-mi radius the plant (311 addresses). The postcards announced the availability of the EIS and requested comments.

TVA received 6 comments including one comment form submitted by several interested parties regarding the NOI. TVA received 12 comment submissions on the Draft EIS. Given the significant public outreach and level of interest submitted to date, TVA does not agree that an additional public meeting is required.

26. Comment: Given the significance of the social issues and environmental and economic impact that alternative B will have, I highly encourage TVA to hold a public meeting at the Claxton community center to fully explain the preferred alternative to the residences of the impacted community. Although TVA has followed the process of the law and advertised through mailings, newspapers, signage, and internet, the impacted communities are low income and will not fully understand the issues they will face when the landfill is constructed and under operation with the methods of information distribution employed. In order to be transparent and open with the public, communication via a public meeting is warranted. (*Commenter: Will Kegley*)

Response: Comment noted. See response to comment 25.

Compliance with State and County Requirements

27. Comment: The EPA requests that the TVA further explore and identify if State and local requirements can or will be met by the selection of the preferred alternative. The EPA has environmental concerns regarding fugitive dust emissions and the proximity of the new proposed landfill to residential areas. With the exception of the small-scale map in Figure 1-1 in the Alternative Site Screening Analysis (Appendix B), the DEIS maps of the BRF Plant's/J Area and its close vicinity do not depict the proximity of the residential areas and that of shopping plazas (the latter, appears to be less than 500 ft. from the proposed onsite, J Area landfill). The EPA recommends that the FEIS provide more detailed maps which are accompanied by narrative information concerning the size of the population at 200, 300, 500 and 1,000-ft. diameters from the edges of the proposed J Area landfill. Also, the distance to the closest school(s), community recreation area(s), shopping plaza(s), public parking lots, office buildings and other areas of relatively high congregation in proximity to the proposed onsite J Area landfill might also be identified in more detailed maps. The TVA may also wish to compare these parameters to the same population concentration parameters along the route to the Chestnut Ridge Landfill to fully depict the comparison between the primary alternatives considered. (*Commenter: USEPA*)

Response: The Site J Project Area as displayed on all figures in the EIS depicts the area which includes the landfill as well as required buffer areas. The limit of fill would be included within the Site J Project Area. The limit of fill of the landfill is not shown on the figures as the EIS considers the impact of conversion of the Site J Project Area to landfill use. However, as stated in Section 2.2.2.1 of the EIS, the proposed landfill would be developed to meet the requirements of a Class II Solid Waste Facility as specified by TDEC Division of Solid Waste Management and Federal Subtitle D requirements for dry CCR disposal. These requirements include the adherence to the necessary buffer zone standards as identified below.

Class II Disposal Facilities must be located, designed, constructed, operated and maintained such that the fill areas are, at a minimum:

- 100 ft from all property lines;
- 500 ft from all residences, unless the owner of the residential property agrees to a shorter distance;
- 500 ft from all wells determined to be down gradient and used as a source of drinking water by humans or livestock;

- 200 ft from the normal boundaries of springs, streams, lakes, (except that this standard shall not apply to any wet weather conveyance nor to bodies of water constructed and designed to be part of the facility; and
- A total site buffer with no construction appurtenances within 50 ft of the property line.

An additional map which illustrates buffer distances in relation to the surrounding community has been added to the FEIS (Figure 2-4) to demonstrate compliance with these buffer area requirements.

TVA considered population along the route to Chestnut Ridge as part of the initial siting study and in the analysis for transportation related impacts as presented in the EIS.

CCR Rule

28. Comment: Based upon the EPA's review of the DEIS, we were not able to identify specific landfill design criteria pertaining to groundwater levels. TVA might consider the elevations of groundwater at the newly proposed onsite landfill at Area J and ensure that these levels comply with the requirements of the 2015 CCR Rule to maintain at least 5 ft of separation between the bottom of the new disposal unit and the highest level of the groundwater table. The TVA might also specify all the measures it would follow to ensure compliance of the new landfill with the April 2015 CCR Rule in the FEIS (i.e., siting requirements, structural stability requirements, and operational requirements. (Commenter: USEPA)

Response: As stated in Section 3.6.1, TVA conducted a comprehensive hydrogeologic investigation of Site J between January 2012 and June 2014. The result of these investigations is summarized in the EIS. As stated in Section 2.2.2.1, TVA's proposed landfill design complies with the regulations for the disposal of CCR under Subtitle D of the Resource Conservation and Recovery Act (CCR Rule) and TDEC Rule 0400-11-01 governing the siting, design and operation of solid waste landfills. These regulations would include adherence to criteria to maintain separation between the bottom of the landfill and the uppermost aquifer. Measures regarding the liner system, leachate collection system, and final cover system are identified in the EIS.

Air Pollution Control

29. Comment: Under Sections 3.1.1 "Affected Environmental" and 3.1.2.2.1 "Construction Impacts," TVA indicates that EPA has designated Anderson County as nonattainment for PM_{2.5}; nearby Knox and Loudon counties are also nonattainment for PM_{2.5}; and Roane County is partial nonattainment for PM_{2.5}. Anderson County is currently in attainment for all criteria pollutants and recommends that TVA correct this information with the Final EIS. (Commenter: TDEC)

Response: Sections 3.1.1 and 3.1.2.2.1 will be corrected in the Final EIS to indicate that Anderson County is in attainment for all criteria pollutants.

30. Comment: Under Section 3.14.2.2.1 "Construction," it is recommended that any tree or limb debris be disposed of using methods other than open burning. If open burning is determined to be the only acceptable disposal method, it is advised that TVA include within the context of the proposed actions in the Final EIS that such activities will be conducted in a manner to encourage responsible smoke dispersion and in accordance with the state open burning regulatory requirements. (Commenter: TDEC)

Response: Tree or limb clearing may be accomplished through open burning, which is allowed in Anderson County and TVA would adhere to all appropriate state and county regulatory requirements if burning of landscape waste is conducted. Text has been added to Section 3.14.2.2.1, Table 3-9 and to Section 2.4 (Identification of Mitigation Measures) to clarify.

31. Comment: “Chapter 4- References” references out of date Environmental Protection Agency (EPA) National Ambient Air Quality Standards (NAAQS). It is recommended that TVA reference the current EPA NAAQS in the Final EIS. (*Commenter: TDEC*)

Response: Current EPA NAAQS (updated July 5, 2016) are referenced in the Final EIS.

32. Comment: Regarding CCR fugitive dust, the EPA contends that the effective impact distance and inhaled dust dose to potential recipients is not only dependent on their distance from the source term, but also on the prevailing wind directions and their speed, on the size of (clusters) of recipient population, and on the average time the emissions would spend within the impact zone of the fugitive dust. The EPA recommends that the TVA consider future monitoring to ensure that off-site populations are not potentially impacted by CCR fugitive dusts and include a more robust analysis in the FEIS. (*Commenter: USEPA*)

Response: As noted in Section 3.1.2.2.1 of the EIS, during construction, the largest fraction (greater than 95 percent by weight) of fugitive dust would be deposited within the construction site boundaries and wet suppression and other BMPs would be utilized to reduce fugitive dust emissions by as much as 95 percent. Further, as stated in Section 3.1.2.2, operation of the proposed landfill would comply with state regulations for fugitive emissions and BRF’s air operating permit conditions. In addition, the CCR rule requires TVA to develop a fugitive dust plan with adequate dust control measures for this site. TVA will keep a log of citizen complaints about fugitive dust and has developed a fugitive dust hotline where concerns regarding fugitive dust can be recorded. Every year TVA will prepare a report detailing the controls used, any citizen complaints received, and a summary of any corrective actions taken.

Land Use

33. Comment: The homes near “Site J” were lovingly maintained by the previous owners until 2012, including the former location of a newly developed large horse farm, which was being developed into a beautiful piece of property with a large horse stable, indoor riding arena and other amenities. TVA should not claim “No Impact” to land use because the property was purchased by TVA. Please help me understand how turning a million dollar horse farm into a landfill is of no impact to the community’s land use and causes no harm to my property value. (*Commenter: John Jenkins*)

Response: The Commenter is incorrect in his assertion that TVA found “no impact” to land use as a result of the development of Site J. TVA recognizes in the FEIS—Table 2-5 and Section 3.3.2.2, that the conversion of currently undeveloped land that is zoned residential to an industrial facility does impact land use. However, portions of Site J had been cleared and leveled to support previous development. In addition, the site is located adjacent to an area used for heavy industrial use (including an existing CCR landfill); therefore, the construction of a landfill at this site would be consistent with the surrounding land uses. Considered in the context of other regional land uses, the site history of prior disturbance, and the consistency of the proposed use with the existing uses on the BRF site, the impact to land use is considered to be minor. However, because the site is currently undeveloped, this change in land use would have a locally moderate impact. The FEIS has been revised accordingly.

34. Comment: Unfortunately the land impact for Alternative B is incorrect. Although this land is currently undeveloped, TVA has mistakenly classified the land use as an “industrial facility”. To be clear a landfill is not an “industrial facility”. The preferred alternative is a landfill. After the landfill has been filled to capacity the land cannot be utilized for any other purpose. Thus, unlike an industrial facility which would have the potential for beneficial land use at the end of its life cycle, the use of the land as a landfill is permanent into perpetuity. To keep honesty and

transparency in the EIS process change the word “Industrial Facility” to “landfill” (page 33 and page 20 table 2.5) and all other references throughout the EIS. (*Commenter: Will Kegley*)

Response: The analysis of impacts to land use as stated in Section 3.3.2 of the EIS notes construction of the proposed facility would result in the permanent conversion of 134.7 ac (Site J and haul road) of primarily undeveloped land to industrial facilities. Industrial facilities include the landfill, access road, borrow stockpile, laydown areas and supporting structures.

Water Resources

35. Comment: The preferred alternative may require modification to the existing Multi-Sector permit to include these two new industrial stormwater outfalls. However, from EPA's review of the DEIS it is not clear whether the wastewater treatment facility has the capability of treating wastewater for potential metals associated with CCR. The FEIS should include additional information on the TVA's preferred alternative and specific measures being considered to avoid and minimize impacts to aquatic resources and water quality. (*Commenter: USEPA*)

Response: Wastewater treatment is discussed in Section 3.7.2.2. Treatment of leachate from the landfill would be provided in the leachate treatment system as required to meet discharge quality standards. The treatment system would utilize the same process as what is currently used for the existing landfill and would include sedimentation, neutralization and coagulation in the stilling impoundment located along Clinch River. Discharge would be at Outfall 001 from the settling pond to the Clinch River as identified in the existing NPDES permit. No new chemical constituents would be introduced to this treatment system that are not already in the existing wastewater streams. The text in the FEIS has been clarified to note that all wastewaters associated with the new landfill will be routed through the existing treatment systems and permitted outfalls.

36. Comment: Wastewater treatment will be required for the proposed action and its alternatives. TDEC recommends TVA include general information about wastewater treatment and National Pollutant Discharge Elimination System (NPDES) permitting requirements in the Final EIS. TVA's operation, maintenance, and/or closure of CCR impoundments at BRF may affect the quality of surface waters receiving discharges from these sites. (*Commenter: TDEC*)

Response: The text in the FEIS has been clarified to note that all wastewaters associated with the new landfill will be routed through the existing treatment systems and permitted outfalls. No additional permits will be required since the wastewaters associated with the new landfill are already authorized under the existing NPDES permit and there will be no new outfall structures. All discharge will meet existing permit requirements.

37. Comment: Any potential runoff from construction and/or demolition project must be monitored, controlled, and properly permitted under the NPDES and Stormwater rules. Additionally, any stream crossings, alterations, or wetland changes as a result of construction or demolition will require an Aquatic Resource Alteration Permit for each action. TVA should identify all actions that will potentially require permits and include a proposed timeline for obtaining these permits within the Final EIS. (*Commenter: TDEC*)

Response: Actions that would require permits are identified in Section 1.7. All permits would be obtained prior to commencement of any construction activities.

38. Comment: The proposed action and its alternatives will require dewatering of the slurry pond. TVA should include in the Final EIS a list of the chemical constituents and their respective concentrations in the slurry pond water. TVA should also discuss the treatment process of this slurry pond water if it will be discharged into a stream after treatment as well as if the discharge will be under the authority of an NPDES existing permit or if a new permit will be required. If

TVA plans to transport the slurry water off-site for disposal, then TVA should provide an explanation of collecting and transporting the slurry water and identify the location that will provide wastewater treatment. *(Commenter: TDEC)*

Response: See response to comment 36. All wastewaters associated with the new landfill will be routed through existing treatment systems and permitted outfalls. Closure of the Ash Impoundment and Sluice Channel were addressed in the Ash Impoundment Closure Programmatic EIS, Part II – Site Specific NEPA Review Bull Run Fossil Plant and were considered as part of the cumulative impact analysis for this EIS. The proposed action does not require dewatering of the ash impoundments.

Wildlife/Threatened and Endangered Species

39. Comment: Bald eagle nesting has been confirmed at BRF. The impact to the habitat of the bald eagle and the possible insult to the eagle population need to be addressed in the EIS. *(Commenter: Will Kegley)*

Response: Bald eagles have been regularly observed over Melton Hill Reservoir and the Clinch River. Although several large osprey nests occur on BRF, no bald eagle nests have been documented on BRF. The area evaluated for wildlife impacts in the EIS included the proposed Site J, the haul road between the proposed landfill site and BRF and their immediate surroundings. Bald eagle nests are not known to occur in these areas or within 660 ft (the recommended landscape buffer distance for most actions outlined in the National Bald eagle Management Guidelines) of these areas. Therefore there would be no impact to bald eagles as a result of either of the proposed alternatives.

40. Comment: If the on-site disposal alternative is selected, the Department will further consult with TVA to address specific endangered species concerns. *(Commenter: US Department of the Interior)*

Response Comment noted. TVA will complete all required consultation.

41. Comment: The EPA defers to the FWS regarding matters pertaining to compliance with the Endangered Species Act. The EPA recommends that any additional conservation measures identified by the FWS during consultation be included in the FEIS and/or Record of Decision (ROD). *(Commenter: USEPA)*

Response: Comment noted. Any additional conservation measures identified will be included in the FEIS and/or Record of Decision.

Solid Waste Management

42. Comment: Under Section 1.2 “Purpose and Need,” the statement is made that “The current on-site storage capacity of approximately 1.2 million yd³ will be expended within 10 years” is not consistent with the production rate of 560,000 yd³ per year. TDEC recommends that TVA specify the remaining on-site disposal capacity and confirm the amount of CCR waste that will be generated in the next 10 years in the Final EIS. *(Commenter: TDEC)*

Response: As outlined in the 2015 Integrated Resource Plan, TVA needs 20-years of disposal capacity for the BRF operational timeline. This time period includes the disposal capacity already present onsite. The Purpose and Need, Section 1.2, TVA’s estimates that current onsite remaining storage capacity will be expended within 10 years. This estimate is based on current energy consumption and production rates. Landfill capacity was based on estimates of future energy production and consumption rates of approximately 560,000 tons of CCR a year (as identified in Section 1.1). TVA revised the text in Section 1.2 of the FEIS to note that based on current estimates of energy production and consumption rates, on-site storage capacity will be

expended within 10 years. Therefore, TVA needs to identify additional storage capacity for the long-term disposal of the dry CCR materials (fly ash, bottom ash and gypsum) produced at BRF.

43. Comment: Under Section 3.14.1.2 “Hazardous Waste,” the facility is currently identified as a small quantity generator (SQG) for hazardous waste. Based upon the various construction activities mentioned in the Draft EIS, there is the potential for the facility to become a large quantity generator (LQG) for hazardous waste due to the potential increase in the quantity of hazardous waste generated. TDEC recommends that TVA review Hazardous Waste LQG requirements to insure continued compliance with hazardous waste regulations. (*Commenter: TDEC*)

Response: TVA does not expect that the proposed action would result in classification as a LQG. However, regulatory requirements for management and disposal of such items would be followed and internal TVA procedures have been developed and implemented to ensure compliance with regulatory requirements.

44. Comment: Under Section 3.14.2.2.1 “Construction,” if soil is excavated and required to be disposed of at a landfill, special waste approval for disposal of the soil may be required. The Department recommends that TVA acknowledge this requirement within the Final EIS. (*Commenter: TDEC*)

Response: TVA has acknowledged this requirement in the Final EIS.

Socioeconomics

45. Comment: Table 2.5 Socioeconomic Resources alternative B – The table states “Minor temporary direct and indirect beneficial impact to the local economy due to construction, and long term minor beneficial impact due [to] operation of the landfill.” In section 3.15.2.2.2 the document states the economic impact will be “negligible” please replace the statement in Table 2.5 with “Negligible” instead of “minor”. It is misleading to the public to state that there will be “minor” economic impact when TVA’s document clearly concludes the impact will be “negligible”. (*Commenter: Will Kegley*)

Response: TVA will correct the description of the long-term economic impact of Alternative B to negligible to match the analysis in Section 3.15.2.2.

46. Comment: Section 3.15.2.2.2 states that “revenue generated by income tax and sales tax from new workers would benefit the local economy.” The positive impact to the local economy from the preferred alternative construction of a new fly ash landfill is grossly overstated in the EIS and is insignificant compared to the negative economic impact of depressed property values and removal of developable land from the county tax base. Given the significance of the negative impacts to the Claxton community. It is recommended that TVA support a local citizens forum comprised of local community leaders who will work with TVA to identify local community projects that will benefit the Claxton community for the deletion of the 150 ac of developable land from the county tax base, socio-economic impact to the low income neighborhoods, and the environmental insult caused by landfilling fly ash. These projects will be funded by TVA as compensation for their negative economic and environmental impact to the local community. (*Commenter: Will Kegley*)

Response: The commenter is correct that Tennessee does not have income taxes and the FEIS has been adjusted to reflect revenue generated through sales tax collected from purchases made by new workers. TVA is a federal entity and is exempt from taxes; however, the TVA Act requires TVA to pay amounts in tax equivalent payments to the states and counties

in which the power operations of TVA are carried on and in which TVA has acquired properties previously subject to state and local taxation.

47. Comment: Please understand that the State of Tennessee and Local County Government do NOT collect payroll taxes so the positive economic impact from the construction and operation of the new landfill from Federal payroll taxes is negligible. Also note that while sales tax is important, people now buy the majority of their goods through the internet with no economic value to Anderson County (The host county for the preferred alternative fly ash landfill). The economic impact language contained in 3.15.2.2.2 is simply incorrect and must be revised to reflect the actual impact to 1. The Claxton Community, 2. Anderson County, and 3. Region. A significant amount of Anderson County's operating revenue comes from property taxes. How will TVA fully compensate Anderson County for the removal of the 150+ acs of developable land from the county tax base forever? Note this is in addition to the current benefit of the meager employment and parks and recreation the TVA currently provides in the county. *(Commenter: Will Kegley)*

Response: Comment noted. Text of the Final EIS will be clarified to note that additional revenue generated by sales tax related to purchases made due to increased income from new workers would have a minor economic benefit. See also response to comment 46.

49. Comment: Section 3.15.2.2.3 Community Facilities and Services impact to the preferred alternative. It is stated that there may be minor impact to the residences and community in the proximity of Valley View Baptist Church. There is a food distribution to low income families that occurs one Saturday per month year round from Valley View Methodist Church. How will TVA work with Valley View Methodist Church to ensure that access to the church during this food distribution is unimpeded? *(Commenter: Will Kegley)*

Response: Access to the Valley View church will be maintained throughout construction and operation of the landfill. As stated in the EIS, there may be some temporary impact to ease of access to the church during initial construction as a result of additional construction traffic on area roadways. However, construction would primarily occur on weekdays during normal working hours and therefore, would not be expected to impact food distribution that occurs one Saturday per month. There would be no impact to access to this church during landfill operation as transport of CCR to the landfill would utilize an on-site haul road.

50. Comment: Section 3.15.2.2.3 Community Facilities and Services impact to the preferred alternative. The document implies there may be minor impact to the residences and community in the proximity of Valley View Baptist Church. Please note that there is a historical cemetery that includes the grave of a revolutionary war soldier (David Hall) as well as other ancestors related to many current residences located in the community at the end of Old Edgemoor Rd adjacent to the TVA boundary. Will landfill operations and construction impede access to this historical cemetery? Please address this concern in the final EIS. *(Commenter: Will Kegley)*

Response: Comment noted. See response to comment 49.

51. Comment: The EPA found that some of the environmental benefits of the preferred alternative may have been overstated in comparison to an off-site disposal option. For example, Alternative Site J contained an on-site private haul road that is located on TVA-owned property adjacent to the BRF. As such, this alternative would have no impacts associated with the transport of CCR on public roadways. Use of this site, in conjunction with existing on-site storage capacity at the BRF, would meet the need for long-term storage of CCR from the BRF. The site had favorable geologic conditions and development and operation of the new landfill would result in relatively low impacts on the natural environment. However, the EPA found that the proposed landfill site is relatively close to existing

residential developments and may result in some potential impacts to environmental justice (EJ) populations. The EPA requests that this issue be further analyzed by the TVA and disclosed in the FEIS. (*Commenter: USEPA*)

Response: An evaluation of the potential impacts to minority and low income communities is provided in Section 3.15 of the EIS. The results of that evaluation concluded that the community located on the south side of SR 170 (Edgemoor Road) just north of the proposed landfill site should be considered a sensitive population that may be subject to environmental justice (EJ) consideration. The EIS notes initial landfill construction may result in adverse effects to the surrounding residences associated with increased noise, exposure to fugitive dust, exhaust emissions, vibrations, increased traffic and generation of solid wastes. Construction-related impacts are temporary and would be minimized through implementation of BMPs designed to limit air emissions, but there would be a minor, temporary intermittent impact associated with noise during initial landfill construction.

TVA also considered the potential for disproportionate adverse impacts to the potential EJ population resulting from exposure to environmental effects (air emissions, wastewater, noise, etc.) of landfill operations. Construction and operation of the proposed landfill will be in accordance with TDEC and federal requirements which are designed to ensure public safety. Based on these measures, neither alternative evaluated in the EIS is expected to have significant impact on human health and the environment. Air emissions would comply with the state regulations for fugitive dust emissions and BRF's air operating permit conditions. CCR would be moisture-conditioned and transported to the landfill over a paved access road that is located within the boundaries of the plant which will minimize exposure to fugitive dust and noise. Operational noise would attenuate and would not impact surrounding residents. Groundwater and surface water impacts are expected to be minor as the new landfill would be required to maintain a liner system and incorporate requirements designed to reduce groundwater and surface water impacts including a storm water and leachate collection system. BMPs designed to prevent discharge of CCR to surface waters would be implemented. There would be an impact to the viewshed of the potentially affected population. Use of the landfill over its lifetime would result in the gradual increase in its height. In time, the proposed landfill would be similar in appearance to the existing dry fly ash stack and be screened to some extent by existing vegetation. Visual and noise impacts would be further mitigated by the construction of a landscape screen along the northern boundary of Site J. The landfill would be located in an area that supports industrial uses and would not require use of land within the existing community or would disrupt access to the surrounding community facilities.

As stated in the EIS, one of the reasons TVA selected Alternative B is that this alternative avoids transport of CCR along SR 170 which would avoid the a long-term indirect impact to this community due to the additional traffic, noise and dust from the trucks transporting CCR to the offsite landfill. Under the preferred alternative, the haul road would be constructed on BRF property at an even greater distance from the potential EJ population (approximately 1,000 ft), and the transport of CCR to the landfill is not expected to result in adverse effects to this local EJ population.

TVA provided opportunities for meaningful involvement to members of this community throughout the NEPA process. Signs were posted around the proposed Site J to identify the publication of the NOI and to invite public comment. Further, TVA distributed post cards to all residents within a 1-mi radius of the plant (311 addresses) to encourage comments on the draft EIS.

Therefore, based on the findings presented in the EIS and summarized above, construction of a landfill at Site J is expected to have a notable visual impact on the potential EJ community. This

impact would be minimized as the landfill would be built within an area that is currently used for heavy industry and would therefore be similar to existing land uses. In addition, TVA has established a 500-foot setback from all residences and planted a vegetative screen that will help to minimize this visual impact to surrounding communities.

52. Comment: There will be a significant negative impact on the already low-income citizens of Ben's Mobile Home Park, located immediate adjacent to the proposed fly ash landfill.
(*Commenter: Mary Kate Cramer*)

Response: Comment noted. See response to comment 51.

53. Comment: The landfill site is very close to two low-income communities which border the property, along with an older subdivision community. In addition, there is a thriving community south from BRF on the other side of Bull Run Ridge. This is where my family lives. We are concerned about air pollution, dust, noise, traffic, and other factors that will clearly make our community less inviting and decreases our property values. In the past, TVA and other government agencies have always tended to provide support for the low-income areas, and let middle-class neighborhoods and tax payers like ourselves fend for themselves. (*Commenter: John Jenkins*)

Response: Comment noted. The analysis in the EIS concludes that there would be no significant disproportionate adverse impacts to the surrounding community as a result of implementation of the proposed alternative. Residents on the south side of Bull Run Ridge would be buffered from any discernable impacts from air pollution, dust, noise and other factors given the attenuating effect of distance from the proposed landfill and the physical barrier of Bull Run Ridge.

54. Comment: Unfortunately the environmental justice issues and socio economic resources are not “minor” for the preferred alternative (Construction of an ash landfill). Near proximity residences to the preferred alternative landfill will be impacted with decreased property values and will suffer the consequences of any failure on TVA's part implementing the landfill best practices. (*Commenter: Will Kegley*)

Response: Comment noted. See response to comment 51.

55. Comment: Although the EIS does admit that some low income residents may be impacted. It clearly does not address the environmental justices issues associated with the preferred alternative. The EIS states “It should be noted that opportunities would be provided to residents with some construction employment, which would provide potential positive impacts to area low-income populations”. Is the above quoted statement TVA's attempt to mitigate the economic injustice that will be caused by TVA's actions to the near proximity low income residences? Please consider creating a jobs program that will be available for able body workers from the near proximity low income residences. This jobs program would entail providing everyone who could pass a minimum standard for manual labor and understand a health and safety briefing, the chance to participate in a TVA beautification program. The program would consist of employees who once per week under supervision will weed eat, and collect trash along New Henderson and Old Edgemoor Road that is adjacent to TVA property. Employees who show initiative and ingenuity under this program would be recognized with citations that can be used on other job applications internal and external to TVA. The program would also give these same recognized employees the chance to apply for full time jobs where they could be trained as equipment operators and/or other labor skills with full time employment from TVA or TVA contractors. The program would also recognize the fact that many of the able workers will have a criminal record and have provision to deal with employees with less than stellar backgrounds? (*Commenter: Will Kegley*)

Response: Comment noted. As indicated in Section 3.15 of the EIS, construction activities would provide opportunities for temporary employment to members of the surrounding community. TVA does not plan on developing an additional job creation program.

Transportation

56. Comment: I must drive down New Henderson Road every day for work, to get groceries and to maintain my connection to the community. If TVA does not provide an overpass for the haul traffic, or worse – remove New Henderson Road completely my driving time for any activity outside my home will DRAMATICALLY increase. Will I be compensated for this increased mileage and time? (*Commenter: Mary Kate Cramer*)

Response: As noted in Section 2.2.2.2, the proposed haul road would be constructed on a bridge over New Henderson Road. This would minimize any impact to traffic movements on New Henderson Road and would only result in minimal impacts to traffic during bridge construction.

57. Comment: Living on old Blacksberry Road and having to travel New Henderson road many times daily, I have concerns with the traffic and or the effects that the equipment will have on the roadways and our automobiles. If any damages are caused our can we submit a claim to? (*Commenter: Rodney Jennings*)

Response: Alternative Site J utilizes an on-site private haul road to transfer CCR to the landfill. As such, this alternative would have no long-term impacts to public roadways.

58. Comment: The planned bridge over New Henderson Road is an absolute necessity, as traffic from 65 fly ash hauls a day would create an unsafe situation for drivers on New Henderson, plus would continually keep the road dusty, slick, and hazardous in all weather conditions. Questions TVA's commitment to build the road. Requests TVA limits road shutdown and construction traffic on New Henderson Road during the construction period. (*Commenter: John Jenkins*)

Response: As stated in Section 3.17.2.2, Minor impacts to traffic on New Henderson Road would occur during installation of the bridge to carry the haul road over the road. However, this impact would be temporary and would not require rerouting or road closure for any significant period of time. Once constructed, traffic on New Henderson Road would be separated from landfill haul road traffic and would not be impacted by haul road truck movements. Construction of the landfill on Site J avoids the off-site transport of CCR along public roads, as well as the long term safety risks and disruptions to the public that would be associated with such off-site transport

59. Comment: The EIS is very clear in multiple parts of the document that a private bridge will be constructed over New Henderson Road and that after construction of the Bridge the existing traffic patterns will be maintained. Is this commitment to maintain the current traffic flow legally binding? What legal recourse will be available to citizens if TVA departs from the decision to maintain the current traffic system after the construction phase is completed? (*Commenter: Will Kegley*)

Response: Comment noted. TVA has committed to construction of the bridge therefore minimizing impacts to the surrounding roadways.

60. Comment: Public Health and Safety Impact does not account for the new traffic patterns caused by the landfill construction for alternative B. Please include the traffic changes into the Health and Safety impacts for the construction phase of the preferred alternative. (*Commenter: Will Kegley*)

Response: Overall, the traffic volume generated by the construction workforce (estimated to be 35 workers during initial construction) and the construction-related vehicles would be relatively minor, and it is assumed that these motorists would disperse throughout the transportation network and use interstate highways or major arterial roadways as much as possible. Therefore no impact to health and safety associated with landfill construction would be anticipated.

61. Comment: New Henderson Road is the primary access road for emergency and law enforcement agencies to access the residences located to the south in Bull Run Valley. How will emergency and law enforcement access via New Henderson Road be maintained during the preferred alternative haul road and private bridge construction? (*Commenter: Will Kegley*)

Response: Comment noted. As identified in Section 3.17.2.2, New Henderson Road would be maintained on its current alignment while the new haul road will pass over it on a new private bridge. Bridge construction would not require rerouting or road closure for any significant period of time. Once constructed, traffic on New Henderson Road would be separated from landfill haul road traffic and would not be impacted by haul road truck movements.

Visual Impacts

62. Comment: It was touched on in the document that I read about the eyesore of the grey mountain we neighbors call it, currently you guys have a pretty big pile of these coal byproduct now that continues to keep growing, trust me and my neighbors when we say it is truly an eyesore. What are the plans to clean this existing mountain up? Not to mention the millions of tons that are going to be placed across the street? I have to tell you, I'm not looking forward to driving between to mountains of coal ash on a daily bases, I honestly don't think many of my neighbors will as well. (*Commenter: Rodney Jennings*)

Response: Comment noted. Closure of the existing dry fly ash stack will include installation of a final cover system which will incorporate soil which will support the growth of suitable vegetation (e.g., topsoil). In addition, post closure monitoring requirements designed to meet state and federal requirements will be established in the closure plan that would be submitted to TDEC as part of the permit application.

63. Comment: Disagrees with the EIS that states the landfill will have no visual impact. The proposed site is currently a beautiful display of East Tennessee landscape including rolling hills, wildlife and indigenous tree. This landfill will destroy all of this and permanently scar the vista (*Commenter: Mary Kate Cramer*)

Response: TVA acknowledges that the proposed facility would contribute to a notable change in visual integrity of the landscape, which would result in a moderate impact to the viewshed of the surrounding community. The existing scenic class, however, is not expected to be reduced by two or more levels, which is the threshold of significance of impact to the visual environment as adapted from the U.S. Forest Service's scenery management handbook. The landfill would be visible to nearby residents and motorists along the local roads, but would be visually similar to the current landscape which has a low or moderately altered scenic quality owing to modifications to the landscape from previous development, as well as the adjacent fossil plant. The topography and vegetation within the surrounding area provide some screening and allow the landscape to absorb the visual changes associated with the proposed landfill at the middleground and background distances. A landscape screen on the northern portion of the site would help to minimize the visual impact to observers in the foreground.

64. Comments: Disagree with the analysis in the EIS that states the landfill will have a "minimal change in the overall scenic value". The current and existing landfill alters the natural state of the valley. (*Commenter: John Jenkins*)

Response: Comment noted. See response to comment 63.

65. Comment: Visual Analysis for the preferred alternative is stated as “Landfill would change the existing visual integrity, but there would be minimal change overall in scenic value”. Are you kidding!? Given that there is a current active fly ash land fill at BRF that can be seen from Edgemoor Road. This current existing landfill is dirt and grass covered most of the time with rip rap drainage and not to mention the geotextile membrane that is always visible. The new land fill will be an eyesore during its entire operational life (10 to 20 years). The “Minimal change” conclusion for visual analysis must be changed to significant impact. Reference Page 21. Note that the measures discussed to reduce visual impact are the same measures being applied to the existing landfill at BRF. If the existing landfill is an eyesore than the preferred alternative landfill will be an eyesore. What additional community improvement investments will TVA make to compensate for the unsightly visual impact caused by the preferred alternative? (*Commenter: Will Kegley*)

Response: TVA recognizes comments from citizens expressing concern about visual impacts and realizes that there are different ways to view impacts to aesthetics. TVA disagrees that there would be a significant visual impact associated with construction of a landfill on Site J, however TVA agrees that there would be a moderate impact to the viewshed of some of the people in the surrounding community. See response to comment 63. This information has been added to the FEIS to clarify.

Noise and Dust

66. Comment: My comments are based on my supposition that the process for the noted new landfill will require that materials (dirt and/or gravel) be brought in often to cover the dry ash that the plant produces. I am concerned that the frequent transporting of materials significant air and noise pollution to Rivers Run Subdivision homes and occupants. (*Commenter: Jack Campbell*)

Response: Comment noted. A 30-day supply of cover material would be maintained to cover the working face in the on-site soil borrow/stockpile areas. Preliminary estimates indicated that sufficient material would be available from on-site sources. However, it is possible that TVA may supplement on-site soil with offsite borrow materials if needed. The location of an off-site permitted borrow area has not been identified at this time.