

**Appendix B – Responses to Comments Received on the Draft
Supplemental Environmental Assessment**

Responses to Comments Received on the Draft Supplemental Environmental Assessment

Commenter	Statement	TVA Response
Dale Wilkerson Superintendent, Shiloh National Military Park	<i>“Upon review of the SEA, we have no objections or comments on the proposed changes.”</i>	Thank you for your comment.
Thomas A. Moss Environmental Review Coordinator, Information Management Unit Division of Water Resources Tennessee Department of Environment and Conservation	<i>“The Division is concerned that the barge traffic and the creation of a barge offloading facility could impact the water supply intake for First Utility District of Hardin County. The intake is in very close proximity to the dam itself. There will be an increase in barge traffic with the potential of barge accidents that could directly affect the intake, as well as the potential for spills from the barges or the barge facility.”</i>	Section 2.1.2.4 identifies measures to avoid impacting the water supply intake for First Utility District of Hardin County during proposed construction activities including use of barges. These measures would include, but are not limited to, clearly delineating the location of the intake, installing additional turbidity curtains, and using precise rock placement methods within 100 feet of the intake. It should also be noted that in the future, TVA may evaluate if the water intake should be relocated. If it is identified as needing to be relocated, TVA will work with Hardin County and evaluate this action in a separate environmental review.
T. Moss	<i>“Please be advised that the location of First UD of Hardin County’s intake is protected as critical infrastructure under Tennessee Code Annotated § 10-7-504(a)(21)(A)(i) and Rule 0400-01-01-.01(5). Rule 0400-01-01-.01(5) states: (5) Non-public records under T.C.A. § 10-7-504(a)(21)(A)(i) In accordance with T.C.A. § 10-7-504(a)(21)(A)(i), the following records, and any other records determined by the Department to be described by such subdivision, shall be treated as confidential and shall not be open for public inspection:</i>	TVA has revised Exhibit 1 of the final and draft SEAs to remove the location of the water supply intake for First Utility District of Hardin County to ensure compliance with Tennessee’s law regarding critical infrastructure.

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	<p><i>(a) The latitude and longitude coordinates of public water system wells, intakes, water mains, water tanks, valves and GIS analyses derived from these data;</i> <i>(b) Records pertaining to the delineation of source water protection areas; and</i> <i>(c) Records pertaining to well head protection areas and inventories of significant potential contaminant sources.”</i></p>	
T. Moss	<p><i>“The land area disturbed, including staging areas, the construction of a gravel road and a barge offloading facility will disturb well more than one acre of land and require a Stormwater Construction Permit (CGP) under the Division’s NPDES Program. The fill areas and barge offloading area and other activities described for the project will impact waters of the state and require an Aquatic Resource Alteration Permit (ARAP).”</i></p>	<p>As noted in Section 1.4 of the SEA, TVA has identified the need to update/amend any existing permits to incorporate the newly proposed SEA activities. This includes coordinating with TDEC to update/amend the NPDES and ARAP permits.</p>
Kendra Abkowitz, Ph.D. Director of Policy and Planning Tennessee Department of Environment and Conservation	<p><i>“TDEC believes the Draft SEA adequately addresses potential impacts to cultural and natural resources within the proposed project area.”</i></p>	<p>Thank you for your comment.</p>
K. Abkowitz	<p><i>“TDEC recommends that dust suppression methods be evaluated for portions of the project where earth movement or soil disturbances will likely occur, and that dust suppression be employed to mitigate any fugitive dust emissions likely to be generated. If open burning is being considered for disposal of tree or vegetative growth, TDEC recommends that other methods of disposal be investigated and that open burning only be employed if no other suitable disposal methods are available. When considering open burning, TDEC recommends avoiding burning on days with poor smoke dispersion, not burning</i></p>	<p>TVA evaluated potential air quality impacts in Section 4.7 of its 2016 final EA. TVA identified the need to implement control measures such as dust suppression and would comply with all local or state requirements for burning. TVA determined that the newly proposed activities of the SEA did not warrant a new air quality impact analysis.</p>

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	<p><i>on air quality alert days, use of good smoke management practices when planning the open burning and insuring coordination with local and state air pollution control agencies, forestry agencies and local fire agencies prior to conducting any planned burning. Finally, TDEC recommends implementing onsite vehicle emissions mitigation planning to insure that excessive vehicle idling is minimized. TDEC recommends the Final SEA reflect these recommendations.”</i></p>	
K. Abkowitz	<p><i>“TDEC recommends that any wastes associated with the proposed action or its alternatives be managed in accordance with the Solid and Hazardous Waste Rules and Regulations of the State of Tennessee. TDEC recommends that the Final SEA reference that any wastes that are generated during the construction process or uncovered during site preparation are subject to the Solid and Hazardous Waste Rules and Regulations of the State of Tennessee.”</i></p>	<p>TVA evaluated potential impacts associated with solid waste in Section 4.11 of its 2016 final EA. TVA determined that the newly proposed activities addressed in the SEA did not warrant a new impact analysis for solid waste. As noted in Section 2.3 of the SEA, TVA would continue to implement appropriate BMPs and mitigation measures identified in the 2016 EA, which would include the solid waste BMPs for spill avoidance, response, and cleanup.</p>
K. Abkowitz	<p><i>“TDEC is concerned that the barge traffic and the creation of a barge offloading facility could impact the water supply intake for First Utility District of Hardin County. The intake is in very close proximity to the dam itself. There will be an increase in barge traffic, with the potential of barge accidents that could directly affect the intake, as well as the potential for spills from the barges or the barge facility. The location of First Utility District of Hardin County’s intake is protected as critical infrastructure under Tennessee Code Annotated 10-7-504(a)(21)(A)(i) and</i></p>	<p>Section 2.1.2.4 identified measures to avoid impacting the water supply intake for First Utility District of Hardin County during proposed construction activities including use of barges. These measures would include, but are not limited to, clearly delineating the location of the intake, installing additional turbidity curtains, and using precise rock placement methods within 100 feet of the</p>

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	<i>Rule 0400-01-01-.01(5). TDEC encourages TVA to include these considerations in the Final SEA.”</i>	intake. TVA also revised Exhibit 1 of the SEA to remove the location of the water intake to ensure compliance with Tennessee law concerning critical infrastructure.
K. Abkowitz	<i>“Proposed activities, including staging areas, the construction of a gravel road and a barge offloading facility, will disturb well more than one acre of land and will require a Stormwater Construction Permit (CGP) under the TDEC’s National Pollution Discharge Elimination System Program (NPDES). The fill areas and barge offloading area and other activities described for the project will impact waters of the state and require an Aquatic Resource Alteration Permit (ARAP). TDEC encourages TVA to include these considerations in the Final SEA.”</i>	As noted in Section 1.4 of the SEA, TVA has identified the need to update/amend any existing permits to incorporate the newly proposed SEA activities. This includes coordinating with TDEC to update/amend the NPDES and ARAP permits.

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