



100 Peabody Place, Suite 850, Memphis, Tennessee 38103

January 14, 2022

Memphis City Council
125 North Main Street
Room 514
Memphis, Tennessee 38103

Re: Allen Restoration Project

Dear Council Members,

We are writing to respond to questions that were discussed regarding the Allen Restoration Project during the January 4, 2022, meeting of the MLGW Committee. Our answers to your most recent questions are below. Additionally, we are providing links to previously developed and publicly available information to supplement the answers provided herein.

We hope this information is helpful.

Question from Council Member Carlisle: What was the bidding process for the landfills and was barge considered as a mode of transporting the ash from the retired Allen Fossil Plant?

TVA Response:

TVA assessed the criteria of 784 potential landfills that could be accessed by rail or barge within a 600-mile radius and serviced by truck within a 30-mile radius.

The bounding criteria developed for the Environmental Impact Statement (EIS) required a rail spur or barge terminal near the landfill. The availability of existing infrastructure was an important factor in order to avoid impacts associated with construction and operation of unloading infrastructure and the combined impacts of over-the-road trucking in addition to rail or barge transport. The benefits of rail and barge transport are significantly lessened if the coal combustion residuals (CCR) still requires over-the-road transport on the shipping and/or receiving end, resulting in additional trucking-related impacts to surrounding communities and additional loading and worker handling of the CCR. In short, barge was considered as a mode of transporting CCR material from the Allen site; however, it was eliminated, in part, for the reasons described above, as well as landfill capacity and cost.

Through the screening process, the EIS analysis identified suitable landfills for the potential long-term storage of CCR. Six landfills advanced through the EIS screening process and the EIS evaluation and received the Request for Proposal (RFP). Those landfills included the South Shelby Landfill, North Shelby Landfill, Tunica Landfill, Arrowhead Landfill, Taylor County Disposal Landfill, and Lee County Landfill.

Links:

Environmental Review Process Documents: [Allen Fossil Plant Ash Impoundment Closures \(tva.com\)](#)

TVA Presentation for community information sessions kicking off public comment period of the EIS (October 9, 2019): [public-meeting-presentation-october-8-2019.pdf \(azureedge.net\)](#)

TVA Virtual Open House (November 17, 2020): [TVA Allen Fossil Plant Virtual Open House \(brightcove.net\)](#)

Memphis City Council/MLGW Committee Meeting (August 3, 2021): [MLG&W Committee \(granicus.com\)](#)

TVA Virtual Community Meeting (September 22, 2021): [Allen Restoration Project Virtual Community Meeting \(tva.com\)](#)

TVA Virtual Community Meeting (September 30, 2021): [Allen Restoration Project Virtual Community Meeting \(tva.com\)](#)

Memphis City Council/MLGW Committee Meeting (October 5, 2021): [MLG&W Committee \(granicus.com\)](#)

Question from Council Member Warren: Did TVA follow the process to receive appropriate approval from environmental regulatory agencies with open meetings prior to executing a contract with Republic Services?

TVA Response:

As a federal agency, TVA must follow the requirements of the National Environmental Policy Act (NEPA) prior to making decisions that could impact the environment. In this instance, TVA followed the required regulatory process under NEPA by ensuring a robust Final Environmental Impact Statement (EIS) for the Allen Fossil Plant Ash Impoundment Closure (2020 EIS). During the EIS process, TVA held public information sessions on January 17, 2019, October 8, 2019, and October 30, 2019, to allow public comment on TVA's proposed actions both during the scoping phase and when the draft EIS was published for public review and comment. Public comments were reviewed, addressed, and summarized in the Scoping Report and Final EIS. During the comment period on the draft EIS in October and November 2019, TVA also participated in four neighborhood and community events in the Memphis area.

In addition, as a part of the remedial investigation regulatory process governed by the Tennessee Department of Environment and Conservation (TDEC), TVA hosted a virtual public meeting on November 17, 2020, to discuss TVA's Proposed Plan for the removal and restoration process. TVA accepted comments on the Proposed Plan for 30 days until December 17, 2020.

TVA's contract with Republic Services was executed after these public meetings associated with TVA's EIS process and the TDEC remedial investigation process.

TVA has been proactive in seeking public comment and input to inform its decision-making, which has included a series of more than 40 public engagement events in Memphis over the last five years including public information sessions, open house meetings, meetings with

leadership from interested stakeholders, and attendance at neighborhood association meetings and hosting booths at community festivals and events. TVA will continue to communicate and engage with the Memphis community going forward.

As TDEC senior advisor, Pat Flood, stated during a September 22, 2021 virtual community meeting on the Allen Restoration Project:

“The South Shelby Landfill is demonstrated to be safe and protective. It meets all Subtitle D requirements. It meets TDEC’s requirements which are over and above Subtitle D requirements, and those designs are known to be protective. So, our expectation is it will be protective. And we’ll be out there monitoring to make sure that things get filled correctly. We’ve already been out there during construction to make sure it was constructed correctly, and it’ll be filled and closed and protected. We think that this is - in fact there’s a whole lot of evidence to support our way of thinking – that the material is going to be moved to South Shelby and disposed of and capped and sealed off in a very environmentally protective way. We’re very comfortable with that... We are in full agreement that the direction that this project is going – the removal of the ash, the putting it in a safe facility – that is the right direction to go. That is the right thing for the citizens of the state of Tennessee.”

Links:

Environmental Review Process Documents: [Allen Fossil Plant Ash Impoundment Closures \(tva.com\)](#)

TVA Presentation for community information sessions kicking off public comment period of the EIS (October 9, 2019): [public-meeting-presentation-october-8-2019.pdf \(azureedge.net\)](#)

TVA Virtual Open House (November 17, 2020): [TVA Allen Fossil Plant Virtual Open House \(brightcove.net\)](#)

TVA Virtual Community Meeting (September 22, 2021): [Allen Restoration Project Virtual Community Meeting \(tva.com\)](#)

Also see attached for an overview of public outreach activities

Question from Council Member Johnson: What is the traffic route from the Allen Fossil Plant to the South Shelby Landfill and does it go through residential areas?

TVA Response to Submitted Questions from Memphis City Council (August 3, 2021)

“Based on the main route of 19.3 miles, we have estimated 72 businesses, 39 houses and 1 apartment complex with 36 units. The route largely avoids residential areas, utilizing primarily Interstate 55, State Route 175, and Malone through commercial and industrial areas.”

Link: [MicrosoftWord - 20210803_FINAL_Q and A_Memphis City Council_Allen Restoration Project \(tva.com\)](#)

Republic Services’ Jason West response to question about the truck route during virtual community meeting (September 22, 2021)

“[T]hese routes were carefully selected, these are well traveled routes, but you can see that we come from the Allen Fossil Plant down River Port Road, 55 South, South Shelby Drive to Malone Road, and then that’s our landfill right there. So these routes were selected to have the least amount of impact on the community so there’s not very many residences or neighborhoods near the route.”

Links:

Video: [Allen Restoration Project Virtual Community Meeting \(tva.com\)](#)

Transcript: [alf_92221_community_mtg_q_and_af763b5b9-2c9b-4139-9c15-2221a0b662b8.pdf \(tva.com\)](#)

Also see attached for an illustration of the truck route.

TVA’s Scott Turnbow response to question about the truck route during virtual community meeting (September 30, 2021)

“[A]s you look at this where the traffic route is, it’s going from an industrial site, specifically the Pidgeon industrial area which is where the plant is located. It will travel the path there through that site on Riverport Road, then it will get on I-55, Interstate 55 and travel east and south on that and then get off there at State Route 175. All industrial areas highway areas down to Malone Road into South Shelby Landfill area where that is also an industrial area. So that is the route.”

Links:

Video: [Allen Fossil Plant - Restoration Followup \(tvavirtual.com\)](#)

Transcript: [alf_93021_virtual_meeting_qa-\(1\)f150adac-ecd4-4146-8a14-1d1a246b9d2a.pdf \(tva.com\)](#)

Additionally, the proposed plan that was published for public comment on November 17, 2020 along with the virtual open house discussed the traffic route from the Allen site to the South Shelby Landfill.

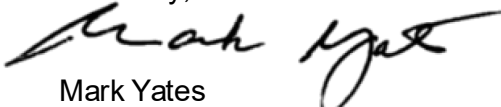
Links:

Proposed Plan: [alf_proposed_plan_for_public_review333182772.pdf \(azureedge.net\)](#)

Video: [TVA Allen Fossil Plant Virtual Open House \(brightcove.net\)](#)

Again, we hope these responses and corresponding links are helpful to you.

Sincerely,



Mark Yates
Regional Vice President

cc: file
Attachments

TVA Allen Restoration Project

September 22, 2021

Deliberative and Pre-Decisional



TVA is a Community Partner



INTERNATIONAL
PORT OF MEMPHIS



TVA has a shared responsibility with the City of Memphis, Shelby County, MLGW, and the Port Commission to safely remove the coal ash and restore the site for the benefit of the community.

Site Partnership & Shared Responsibility

The partnership between TVA, MLGW, the City of Memphis, Shelby County, and the Port Commission is reflected in the site itself.

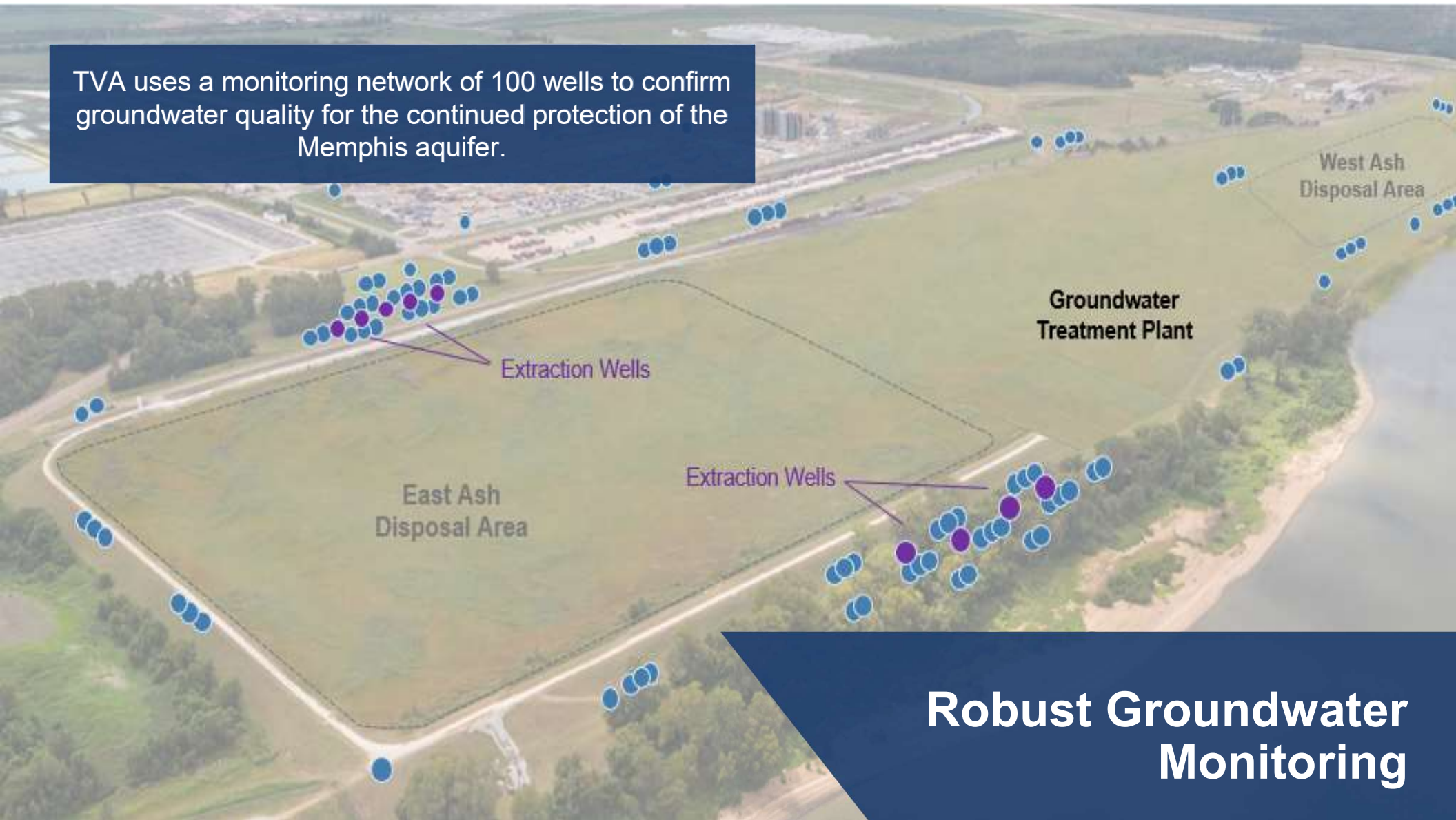
WEST ASH DISPOSAL AREA

FORMER ALLEN FOSSIL PLANT SITE

EAST ASH DISPOSAL AREA

EAST ASH DISPOSAL AREA	ALLEN FOSSIL PLANT	WEST ASH DISPOSAL AREA
<p>City and County hold fee title. The Port Commission owns the ash.</p>	<p>TVA owns the fossil plant and manages the ash.</p>	<p>The City and MLGW hold fee title to the pond and the ash.</p>

TVA uses a monitoring network of 100 wells to confirm groundwater quality for the continued protection of the Memphis aquifer.



Robust Groundwater Monitoring

TVA Puts Safety First

TVA has commissioned specially designed trucks that will be used exclusively for the Allen restoration project. The trucks have impermeable beds that are water-tight and they include secure cover systems that prevent fugitive dust.



CCR Haul Route from Allen Site to South Shelby Landfill

TVA Allen
Fossil Plant

RIVERPORT RD

55

240

78

176

175

MALONE RD

South Shelby
Landfill

The route begins and ends within industrial areas of Shelby County.

The route includes mostly I-55 and State Route 175.

The average number of daily trips from this project represent an increase of only 0.3% to 0.6% in traffic on these roadways.

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Deliberative and Pre-Decisional

Regular Community Involvement

November 2018
Community meeting at the TO Fuller Park Interpretive Center



Oct. 8, 2019
Community meeting at Mitchell Community Center

Oct. 30, 2019
Community meeting at Benjamin L. Hooks Central Library

Nov. 2020
Virtual Open House - Public Meeting



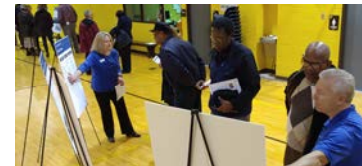
January 2019
Community information session at the Mitchell Community Center

Oct. 2019 Outreach Events
Oct. 19 - T.O. Fuller Green Fest
Oct. 26 - Walker Homes Neighborhood Association

Oct. 31, 2019
Meeting with Sierra Club and Protect our Aquifer



Nov. 2019 Outreach Events
Nov. 2 - Westwood Neighborhood Association
Nov. 13 & 14 - TVA Board Listening Session / Board Meeting
Nov. 16 - Agricenter Harvest Festival



- Quarterly MOA Meeting
- Quarterly TDEC Meeting
- TVA Sponsored Community Event