



Tennessee Valley Authority, Post Office Box 2000, Soddy Daisy, Tennessee 37384-2000

October 1, 2018

Chattanooga Environmental Field Office
Division of Water Resources
1301 Riverfront Parkway, #206
Chattanooga, Tennessee 37402-2013

TENNESSEE VALLEY AUTHORITY - SEQUOYAH NUCLEAR PLANT – TENNESSEE MULTI-SECTOR GENERAL PERMIT (TMSP) PERMIT NO. TNR050015, SECTOR O – EXCEEDANCE OF BENCHMARK MONITORING REQUIREMENT

Storm water outfalls 1, 4, and 6 were sampled for iron during a qualifying rain event on September 6, 2018. Analyses of the samples resulted in iron concentrations which exceeded the benchmark value of 5 mg/L. The analytical results for these samples are summarized in Table 1 below.

Table 1. Total Recoverable Iron Results

Storm Water Outfall Number	Sample Date	Analytical Results Received by TVA	Analytical Results (mg/L)	Benchmark Concentration (mg/L)
1	09/06/2018	09/15/18	21.5	5
4	09/06/2018	09/15/18	18.6	5
6	09/06/2018	09/15/18	9.73	5

This letter serves as the 30- and 60-day notification of benchmark exceedances for total recoverable iron.

30-Day Requirement

Per the permit requirement, the areas surrounding Outfalls 1, 4, and 6 were inspected to determine the likely cause of the exceedances. The following potential issues were identified:

- Outfall 1 – This outfall is located downhill from an area where cathodic protection equipment is being installed as part of licensing renewal requirements at the site. Trucks entering and leaving the area created a soil disturbance which is believed to be the source of the iron exceedance.
- Outfall 4 – There is a laydown yard within 50 feet of this outfall. Some of the equipment in the laydown yard has rusted. Run-off from this equipment is most likely the cause of the exceedance at this outfall.
- Outfall 6 - The iron exceedance from this outfall is most likely due to run-off from a spoils area temporarily being used to store hydro-excavated soil. The spoils area is approximately 200 ft from the outfall.

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60-Day Requirement

The Storm Water Pollution Prevention Plan (SWPPP) has been reviewed to identify changes that need to be incorporated in the plan to reduce the iron concentrations at outfalls 1, 4, and 6. The proposed changes and their corresponding timetable for completion are shown in Table 2.

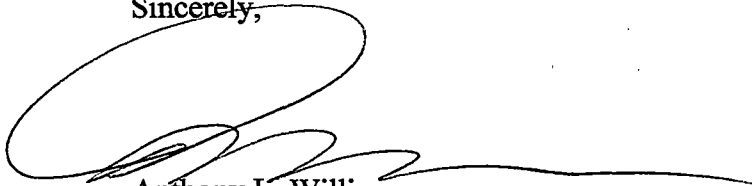
Table 2. Proposed Corrective Actions and Timetable for Completion

Outfall	Actions to reduce iron concentration	Completion date
1	Stabilize disturbed soil around cathodic protection area by the addition of stone along the driving area and by applying straw and seed to adjacent bare areas.	10/31/18
4	Remove rusted equipment from laydown area. Add heavy metal adsorbent socks around the opening of the outfall.	11/30/18
6	Place additional silt fencing around the perimeter of the spoils area. Line the inside of the silt fence with hay bales. Create a swale in the road leading to the spoils area to divert the flow of water from the spoils area to a grassy field.	10/31/18
n/a	Revise SWPPP to incorporate additional BMPs at outfalls 1, 4, and 6	11/15/18

If you have questions or need additional information, please contact Millicent Garland by phone at (423) 843-6714 or by e-mail at mrmoore@tva.gov.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Sincerely,



Anthony L. Williams
Site Vice President
Sequoyah Nuclear Plant

cc

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