

Bonnie Bashor - FW: Department of Health Public Health Report correction to NEC comments

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Date: 11/13/2009 8:52 AM
Subject: FW: Department of Health Public Health Report correction to NEC comments
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Bonnie

Thanks for the opportunity to review the PHA. I appreciate all of the efforts you all have put into this document. Below are a number of comments on the report. We are focusing only on the facts and data from our standpoint.

Please let me know if any of these comments do not make sense.

Thanks!

Joe Hoagland

1. Page xxxi: Conclusion 13—I'm asking Environmental Standards and Bill Rogers whether they agree with the statement that "Data from all agencies agree...that levels of arsenic in the Emory River at the site of the release are elevated..." The fix may simply be to change the verb to past tense and add a qualifier ("were elevated, immediately following the spill" instead of "are elevated").
2. Same page, Basis for Decision paragraph: The statement that "Non-governmental organizations collected most of the data in the days just after the coal ash release and in areas near the release" is incorrect. TVA collected water quality data at 11 locations on the Clinch and Emory Rivers and at the Kingston water treatment plant on December 22, 23, and 26. EPA collected data from several of the same locations on December 23 and 26. TVA began collecting air quality data on December 28, as did EPA, and TVA, EPA, and TDEC collected several soil and ash samples between December 27 and December 31.
3. Page 1, paragraph 2: The ash produced by KIF is approximately 20% bottom ash and 80% fly ash. Because of the design of the bottom ash sluice ditch and the fly ash ditch prior to the release, the ash that actually made it to the ash pond was nearly 100% fly ash.
4. Same page & paragraph: Fly ash is not lightweight (specific gravity is about 2.5). The concern about it becoming airborne is because it contains very small particles.
5. Page 2, paragraph 4: Need to add Tennessee Emergency Management Agency to the discussion, especially since TEMA had the primary state responsibility for coordinating efforts of other state agencies.

6. Page 3, paragraph 2: Need to change date in first line to December 22.
7. Page 14, paragraph 3: TVA collected ash samples beginning December 27, not Dec. 23. Most of the analytical results mentioned came from samples collected December 31.
8. Page 21, paragraph 2: TVA also collected fish in the Emory River in conjunction with TDEC, TWRA, and ORNL.
9. Page 22 – a typo exists on the graphs - “waterswater” should be “waters”
10. Page 38, embedded table: The date in the last line for TVA air monitoring has an incorrect date. It should read December 28, not December 38.
11. Page 39 – TVA is not analyzing for thallium any more at the frequency indicated, only arsenic.
12. Page 40 – new air sampling contractor is Shaw – mentions that CTEH is continuing to collect air samples.
13. Page 62, last paragraph: Examining the TSS results for the Waterkeeper Alliance samples clearly shows that the sample they cite with extremely high arsenic values came from the ash “berg” since it was an approximately 4% slurry of ash.
14. Page 76, Paragraph 5. See comment 3 above.

The Quote from Steve Strunk should actually read as follows:

Current ash generation at KIF results from burning a 50%/50% blend of Central Appalachian/ Powder River Basin coal (personal communication, Steven C. Strunk, TVA, March 17, 2009). The fly ash in the dredge cell was the product of burning different coal types over the years. Analyses commissioned by TVA of this fly ash averaged 32.7% PM10 and 8.5% PM2.5.