



THE STATE OF TENNESSEE  
**TENNESSEE EMERGENCY MANAGEMENT AGENCY**  
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11/05/09

Agency for Toxic Substances and Disease Registry  
ATTN: Records Center

SUBJECT: Draft Public Health Assessment for Coal Ash Release, TVA Kingston Fossil Plant

The Tennessee Emergency Management Agency (TEMA) has reviewed the Agency for Toxic Substances and Disease Registry (ASTDR) Public Health Assessment for the Coal Ash Release, Tennessee Valley Authority (TVA) Kingston Fossil Plant at 714 Swan Pond Road, Harriman Tennessee. We concur with the general details provided concerning the events and actions taken by State and Local government during the response phase of the emergency.

The TVA Ash Spill event was a unique event that has not occurred in Tennessee before. As part of our internal process for significant emergencies and disasters, we conducted a detailed review and after action process with our state and local partners. Several issues surfaced that are cogent to the ASTDR Assessment and we believe should be addressed in the final report.

First, Roane County's Emergency Management organization represents some of the most highly trained emergency response personnel in the state. Their rapid and highly effective response during the early morning hours of 22 Dec 2008, can in part, be attributed to the long established program associated with the Department of Energy and State of Tennessee. Through this partnership, DOE program funding provides State and Local agencies the ability to develop a robust planning and exercise program. Though the primary purpose of this program is focused on responding to an offsite emergency associated with an event at the Oakridge Reservation, the indirect benefits of this program are quite significant and were clearly displayed on the morning of 22 Dec 2008.

Though the ATSDR Assessment addresses only the impact on Public Health from TVA's Kingston Fossil Plant, there are six other locations across Tennessee where TVA operates fossil plants. Many of these plants are in counties where there are much less capable Emergency Management Programs—staffed by volunteers and operate with little or no funding. We believe a similar catastrophic release of an ash retention pond at the other sites would have a much greater impact on the public (loss of life, response coordination, etc).

The second issue not addressed in the assessment; no offsite plan was in place at the time of the Kingston Ash Spill. The lack of pre-planning and coordination was a significant detriment during the response phase. To correct this deficiency, TVA and local emergency managers should move quickly to develop comprehensive offsite response plans to address each of TVA's power plants. TEMA believes a model based upon the current TVA Fixed Nuclear Program would provide an excellent template for developing comprehensive offsite response between federal, state and local agencies.

TEMA stands ready to work with federal, state and local agencies to enhance the emergency management programs so we can continue to provide the citizens of Tennessee with rapid and effective emergency response and recovery operations. If you have any questions, please feel free to contact TEMA at (615) 741-0001.