AI: 88312
MSR109503

Rec'd via email: 03/10/2025

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

LARGE CONSTRUCTION NOTICE OF INTENT (LCNOI) FOR COVERAGE UNDER THE LARGE CONSTRUCTION STORM WATER GENERAL NPDES PERMIT

INSTRUCTIONS

The Large Construction Notice of Intent (LCNOI) is for coverage under the Large Construction General Permit for land disturbing activities of five (5) acres or greater; or for land disturbing activities, which are part of a larger common plan of development or sale that are initially less than five (5) acres but will ultimately disturb five (5) or more acres. Applicant must be the owner or operator. For construction activities, the operator is typically the prime contractor. The owner(s) of the property and the prime contractor associated with regulated construction activity on the property have joint and severable responsibility for compliance with the Large Construction Storm Water General Permit MSR10.

If the company seeking coverage is a corporation, a limited liability company, a partnership, or a business trust, attach proof of its registration with the Mississippi Secretary of State and/or its Certificate of Good Standing. This registration or Certificate of Good Standing must be dated within twelve (12) months of the date of the submittal of this coverage form. Coverage will be issued in the company name as it is registered with the Mississippi Secretary of State.

Completed LCNOIs should be filed at least thirty (30) days prior to the commencement of construction. Discharge of storm water from large construction activities without written notification of coverage is a violation of state law.

Submittals with this LCNOI must include:
- **A site-specific Storm Water Pollution Prevention Plan (SWPPP) developed in accordance with ACT5 of the General Permit**
- **A detailed site-specific scaled drawing showing the property layout and the features outlined in ACT5 of the General Permit**
- **A United States Geological Survey (USGS) quadrangle map or photocopy, extending at least one-half mile beyond the facility property boundaries with the site location and outfalls outlined or highlighted. The name of the quadrangle map must be shown on all copies. Quadrangle maps can be obtained from the MDEQ, Office of Geology at 601-961-5523.**

Additional submittals may include the following, if applicable:
- **Appropriate Section 404 documentation from U.S. Army Corps of Engineers**
- **Appropriate documentation concerning future disposal of sanitary sewage and sewage collection system construction**
- **Appropriate documentation from the MDEQ Office of Land & Water concerning dam construction and low flow requirements**
- **Approval from County Utility Authority in Hancock, Harrison, Jackson, Pearl River and Stone Counties**
- **Antidegradation report for disturbance within Waters of the State**

ALL QUESTIONS MUST BE ANSWERED (Answer "NA" if the question is not applicable)

O.C

MSR10 9503 _ _ _ _

(NUMBER TO BE ASSIGNED BY STATE)

APPLICANT IS THE: ☑ **OWNER** ☐ **PRIME CONTRACTOR**

OWNER CONTACT INFORMATION

OWNER CONTACT PERSON: DREW REID

OWNER COMPANY LEGAL NAME: TENNESSEE VALLEY AUTHORITY

OWNER STREET OR P.O. BOX: 1101 MARKET ST

OWNER CITY: CHATTANOOGA **STATE:** TN **ZIP:** 37402

OWNER PHONE #: (615) 5669149 **OWNER EMAIL:** DTREID@TVA.GOV

PREPARER CONTACT INFORMATION

IF NOI WAS PREPARED BY SOMEONE OTHER THAN THE APPLICANT

CONTACT PERSON: JESSICA LYON

COMPANY LEGAL NAME: TENNESSEE VALLEY AUTHORITY

STREET OR P.O. BOX: 1101 MARKET ST

CITY: CHATTANOOGA **STATE:** TN **ZIP:** 37402

PHONE # (**)** **423-751-2810** **EMAIL:** **JLLYON@TVA.GOV**

PRIME CONTRACTOR CONTACT INFORMATION

PRIME CONTRACTOR CONTACT PERSON: N/A

PRIME CONTRACTOR COMPANY LEGAL NAME: N/A

PRIME CONTRACTOR STREET OR P.O. BOX: N/A

PRIME CONTRACTOR CITY: N/A **STATE:** N/A **ZIP:** N/A

PRIME CONTRACTOR PHONE #: (___) N/A **PRIME CONTRACTOR EMAIL:** N/A

FACILITY SITE INFORMATION

FACILITY SITE NAME: TVA MIDWAY-SOUTH MACON-DEKALB 161KV TRANSMISSION LINE

FACILITY SITE ADDRESS (If the physical address is not available, please indicate the nearest named road. For linear projects indicate the beginning of the project and identify all counties the project traverses.)

STREET: 13253 HIGHWAY 14 EAST

CITY: MACON STATE: MS COUNTY: NOXUBEE ZIP: 39341

FACILITY SITE TRIBAL LAND ID (N/A If not applicable): N/A

TOTAL ACREAGE THAT WILL BE DISTURBED [1]: 402

IS THIS PART OF A LARGER COMMON PLAN OF DEVELOPMENT? **YES** ☐ **NO** ☑

IF YES, NAME OF LARGER COMMON PLAN OF DEVELOPMENT: N/A
AND PERMIT COVERAGE NUMBER: MSR10 N/A

ESTIMATED CONSTRUCTION PROJECT START DATE: 2025-05-23
YYYY-MM-DD

ESTIMATED CONSTRUCTION PROJECT END DATE: 2029-04-03 (YYYY-MM-DD)

DESCRIPTION OF CONSTRUCTION ACTIVITY: LINEAR TRANSMISSION PROJECT

PROPOSED DESCRIPTION OF PROPERTY USE AFTER CONSTRUCTION HAS BEEN COMPLETED:
NEW TRANSMISSION LINE

SIC Code: 4911 **NAICS Code** 221112

NEAREST NAMED RECEIVING STREAM: WOLF CREEK

IS RECEIVING STREAM ON MISSISSIPPI'S 303(d) LIST OF IMPAIRED WATER BODIES? (The 303(d) list of impaired waters and TMDL stream segments may be found on MDEQ's web site: http://www.deq.state.ms.us/MDEQ.nsf/page/TWB_Total_Maximum_Daily_Load_Section**)** YES☐ NO☑

HAS A TMDL BEEN ESTABLISHED FOR THE RECEIVING STREAM SEGMENT? YES☐ NO☑

FOR WHICH POLLUTANT:

ARE THERE RECREATIONAL STREAMS, PRIVATE/PUBLIC PONDS OR LAKES WITHIN ½ MILE DOWNSTREAM OF PROJECT BOUNDRY THAT MAY BE IMPACTED BY THE CONSTRUCTION ACTIVITY? YES ☐ NO ☑

EXISTING DATA DESCRIBING THE SOIL (for linear projects please describe in SWPPP):
LINEAR PROJECT - SEE SWPPP

WILL FLOCCULANTS BE USED TO TREAT TURBIDITY IN STORM WATER? YES☐ NO☑

IF YES, INDICATE THE TYPE OF FLOCCULANT.
☐ **ANIONIC POLYACRYLIMIDE (PAM)**
☐ **OTHER** _____

IF YES, DOES THE SWPPP DESCRIBE THE METHOD OF INTRODUCTION, THE LOCATION OF INTRODUCTION AND THE LOCATION OF WHERE FLOCCULATED MATERIAL WILL SETTLE?

IS A SDS SHEET INCLUDED FOR THE FLOCCULATE? YES ☐ NO ☐

WILL THERE BE A 50 FT BUFFER BETWEEN THE PROJECT DISTURBANCE AND THE WATERS OF THE STATE? YES ☑ NO☐

IF NOT, PROVIDE EQUIVALENT CONTROL MEASURES IN THE SWPPP.

[1]Acreage for subdivision development includes areas disturbed by construction of roads, utilities and drainage. Additionally, a housesite of at least 10,000 ft^2 per lot (entire lot, if smaller) shall be included in calculating acreage disturbed.

DOCUMENTATION OF COMPLIANCE WITH OTHER REGULATIONS/REQUIREMENTS

COVERAGE UNDER THIS PERMIT WILL NOT BE GRANTED UNTIL ALL OTHER REQUIRED MDEQ PERMITS AND APPROVALS ARE SATISFACTORILY ADDRESSED

IS LCNOI FOR A FACILITY THAT WILL REQUIRE OTHER PERMITS? YES ☐ NO ☑

IF YES, CHECK ALL THAT APPLY: ☐ AIR ☐ HAZARDOUS WASTE ☐ PRETREATMENT

☐ WATER STATE OPERATING ☐ INDIVIDUAL NPDES ☐ OTHER: _____

IS THE PROJECT REROUTING, FILLING OR CROSSING A WATER CONVEYANCE OF ANY KIND? (If yes, contact the U.S. Army Corps of Engineers' Regulatory Branch for permitting requirements.) YES ☑ NO ☐

IF THE PROJECT REQUIRES A CORPS OF ENGINEER SECTION 404 PERMIT, PROVIDE APPROPRIATE DOCUMENTATION THAT:

- **The project has been approved by individual permit, or**
- **The work will be covered by a nationwide permit and NO NOTIFICATION to the Corps is required, or**
- **The work will be covered by a nationwide or general permit and NOTIFICATION to the Corps is required**

USACE FILE ID SAM-2024-01119-SNR

IS THE PROJECT REROUTING, FILLING OR CROSSING A STATE WATER CONVEYANCE OF ANY KIND? (If yes, please provide an antidegradation report.) YES ☐ NO ☑

IS A LAKE REQUIRING THE CONSTRUCTION OF A DAM BEING PROPOSED? (If yes, provide appropriate approval documentation from MDEQ Office of Land and Water, Dam Safety.) YES ☐ NO ☑

IF THE PROJECT IS A SUBDIVISION OR A COMMERCIAL DEVELOPMENT, HOW WILL SANITARY SEWAGE BE DISPOSED? Check one of the following and attach the pertinent documents.

☐ **Existing Municipal or Commercial System. Please attach plans and specifications for the collection system and the associated "Information Regarding Proposed Wastewater Projects" form or approval from County Utility Authority in Hancock, Harrison, Jackson, Pearl River and Stone Counties. If the plans and specifications can not be provided at the time of LCNOI submittal, MDEQ will accept written acknowledgement from official(s) responsible for wastewater collection and treatment that the flows generated from the proposed project can and will be transported and treated properly. The letter must include the estimated flow.**

☐ **Collection and Treatment System will be Constructed. Please attach a copy of the cover of the NPDES discharge permit from MDEQ or indicate the date the application was submitted to MDEQ (Date: _____.)**

☐ **Individual Onsite Wastewater Disposal Systems for Subdivisions Less than 35 Lots. Please attach a copy of the Letter of General Acceptance from the Mississippi State Department of Health or certification from a registered professional engineer that the platted lots should support individual onsite wastewater disposal systems.**

☐ **Individual Onsite Wastewater Disposal Systems for Subdivisions Greater than 35 Lots. A determination of the feasibility of installing a central sewage collection and treatment system must be made by MDEQ. A copy of the response from MDEQ concerning the feasibility study must be attached. If a central collection and wastewater system is not feasible, then please attach a copy of the Letter of General Acceptance from the State Department of Health or certification from a registered professional engineer that the platted lots should support individual onsite wastewater disposal systems.**

INDICATE ANY LOCAL STORM WATER ORDINANCE (I.E. MS4)WITH WHICH THE PROJECT MUST COMPLY:

N/A

N/A

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 gathered and evaluated 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.

DTRP

Signature of Applicant[1] (owner or prime contractor)

03/04/2025

Date Signed

Drew Reid

Printed Name[1]

VP, Trans Constr and Maintenance

Title

[1]This application shall be signed as follows:

- **For a corporation, by a responsible corporate officer.**
- **For a partnership, by a general partner.**
- **For a sole proprietorship, by the proprietor.**

For a municipal, state or other public facility, by principal executive officer, mayor, or ranking elected official

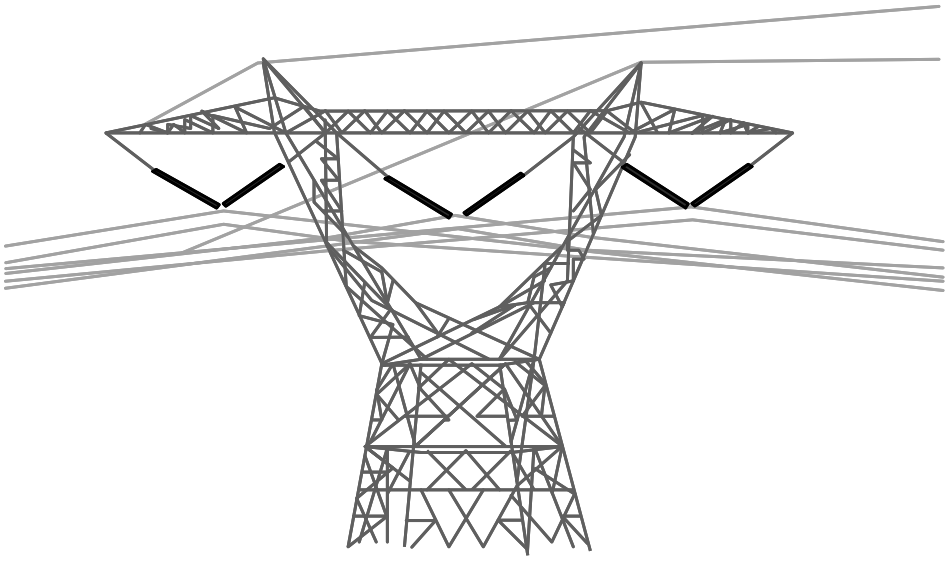
Please submit the LCNOI form to: **Chief, Environmental Permits Division**
MS Department of Environmental Quality, Office of Pollution Control
P.O. Box 2261
Jackson, Mississippi 39225

Electronically: **https://www.mdeq.ms.gov/construction-stormwater/**

Storm Water Pollution Prevention Plan
SWPPP

MIDWAY-SOUTH MACON-DEKALB 161-KV TRANSMISSION LINE

(WO 2T009, 2T034)



Tennessee Valley Authority

March 2025
Rev 0

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List of Abbreviations

BMP	Best Management Practices
MDEQ	Mississippi Department of Environmental Quality
PES	Project Environmental Support
ROW	Right of Way
SMZ	Streamside Management Zone
SWPPP	Storm Water Pollution Prevention Plan
TVA	Tennessee Valley Authority
WWC	Wet Weather Conveyance

1.0 Description of the Construction Activity

The Tennessee Valley Authority (TVA) proposes to improve the existing power supply in the Starkville and eastern Mississippi areas by constructing a new transmission line totaling about 52.2 miles. The proposed project would utilize about 363 acres of existing right-of-way (ROW) and approximately 268 acres of new ROW.

2.0 Project Description

TVA proposes to construct approximately 52.2-miles of new transmission line. The proposed project would utilize about 363 acres of existing right-of-way (ROW) and approximately 268 acres of new ROW. The new Midway-South Macon-Dekalb 161-kV transmission line would be mostly constructed using single-pole structures. Portions of the TL section from South Macon to Dekalb would also utilize two-pole, double-circuit, steel structures.

The first phase of the proposed project would include constructing the approximate 19.4-mile Midway-South Macon 161-kV TL section to connect TVA's existing Midway 161-kV Substation located in Winston County and TVA's existing South Macon 161-kV Substation in Noxubee County. This TL section would utilize about 13.5 miles of existing 100-foot-wide ROW totaling 163 acres along the retired Midway-Macon 46-kV TL. The remaining 5.9 miles would be constructed on a new 100-foot-wide ROW totaling 71 acres.

The second phase of the proposed project would include constructing approximately 32.8-miles of the South Macon-DeKalb 161-kV TL section which would utilize approximately 200 acres of existing ROW and 197 acres of new ROW. This 32.8-mile TL would use about 14.4 miles of existing 75-foot-wide ROW which would be expanded to 100-foot-wide, 3.5 miles of existing 100-foot-wide ROW, and 14.9 miles of new 100-foot-wide ROW. This transmission line would provide a second connection between TVA's existing South Macon 161-kV Substation located in Noxubee County and TVA's existing DeKalb 161-kV Substation in Kemper County. Additionally, this line would also provide a delivery point to East Mississippi Electric Power Association's (EMEPA) upgraded Scooba 161-kV Substation in Kemper County.

Temporary access roads suitable for construction equipment will be utilized at points strategic to structure locations along the proposed route. Construction exits will be installed where access points intersect paved roads.

2.1 Major Soil Disturbing Activities

This project will involve construction of approximately 52.2-miles of new 161-kV transmission line located in Noxubee, Winston, and Kemper counties.

The transmission loop-line portion of the project is to be performed in three stages: (1) bush hogging and clearing of the right-of-way, access road preparation, BMP installation; (2) structure installation and conductor installation; and (3) site restoration.

The clearing contractor will clear wooded portions of the right-of-way, bush-hog other areas as necessary, install BMPs and cut any danger trees located along the right-of-way. Construction crews will then spot the material at the site, erect transmission line structures, and install conductor. The clearing contractor will then return to perform final restoration of the site. Areas disturbed by clearing but not expected to be disturbed further will be restored during clearing.

2.2 Sequence of Major Events

Table 1 lists the major activities for the project and the estimated start/end date, respectively.

Table 1. Estimated Project Schedule

Activity	Start Date	End Date
Bush hog / vegetation clearing, BMP installation	5/23/2025	11/18/2025
Transmission line construction	6/17/2025	10/19/2028
Site Restoration	7/3/2026	4/3/2029

2.3 Estimate of Site Area and Disturbed Area

The approximate area of ground disturbance for the entire project is 402 acres as shown in Table 2 below.

Table 2. Disturbed Area

Activity Generating Disturbance	Area (ac)
TL Structures	80.5
ROW vegetation clearing for 52.2-mile TL	313
Access routes outside of ROW	8.25
Total Disturbed Area	402

2.4 Existing Site Conditions

The project area within Noxubee, Winston, and Kemper Counties and is located within the Southeastern Plains physiographic province. The terrain is a mix of flat and gently rolling terrain which is utilized by existing transmission line right-of-way, agricultural land, wetlands and residential areas.

All water resources would receive TVA Category A Streamside Management Zones (SMZs) with a buffer as shown in Table 3 below.

Table 3. TVA Standard Streamside Management Zones (SMZs)

SMZ Category	% Slope of Adjacent Lands				
	1-10	11-20	21-30	31-40	41+
	SMZ Width each side (ft)				
A - Standard	50	70	90	110	130
B - Important	70	90	110	130	150
C - Unique	90	110	130	150	170
(SMZ width increases 20 ft for each 10% increase in slope)					

2.5 Pre/Post-Construction Runoff Coefficient

The increase in impervious area associated with this project will be negligible. Natural ground cover on the right-of-way will remain or be replaced with grasses or other vegetation. Because the right-of-way will consist of vegetative cover after construction and any contour changes will be insignificant, the flow patterns will remain essentially the same.

2.6 Receiving Waters and Wetlands

2.6.1 Receiving Waters

Field surveys along the Midway-South Macon section were conducted in December 2022, and January and February of 2023. Field surveys along the South Macon-Dekalb section were conducted in August 2023 and June 2024. A total of 44 watercourses including 14 perennial streams, 9 intermittent streams, 16 WWC/ephemeral streams, and 4 ponds were observed during the field surveys.

The proposed project area consists of two TL sections: the Midway-South Macon section, located in Noxubee and Winston counties, and the South Macon-Dekalb section, which is located in Kemper and Noxubee counties. The Midway-S. Macon section falls within the following 10-digit hydrologic unit code (HUC) watersheds: Hashuqua (0316010804), Horse Hunter's Creek-Noxubee River (0316010805), Shuqualak Creek-Noxubee River (0316010807), and Running Water Creek-Macedonia Creek (0316010806). The S. Macon-Dekalb section falls within the following 10-digit HUC watersheds: Running Water Creek-Macedonia Creek (0316010806), Shuqualak Creek-Noxubee River (0316010807), Wahalak Creek (0316010808), Bodka Creek (0316010810), and Running Tiger Creek-Sucarnoochee River (0316020201). All these watersheds fall within the Noxubee watershed HUC-03160108.

MDEQ designates uses specified in water quality standards for each water body within the state. These designations rely on the use and value of water for public water supplies, protection and propagation of aquatic life, recreation in and on the water, and protection of consumers of fish and shellfish. All streams and rivers near or within the project area are classified by MDEQ as Fish and Wildlife, which is a classification intended for fishing and should support protection and propagation of fish, aquatic life, and wildlife (MDEQ 2024b).

The CWA, under Section 303(d), requires States to identify all waters in which required pollution controls are not sufficient to attain or maintain applicable water quality standards and to establish priorities for the development of limits based on the severity of the pollution and the sensitivity of the established uses of those waters. In addition, the State assigns a priority for development of Total Maximum Daily Loads (TMDL) based on the severity of the pollution and the sensitivity of the uses, among other factors (EPA 2023). States are required to submit reports to the EPA every two years to help better understand what mitigation efforts should be made for water bodies that are at risk. The term "303(d) list" refers to the list of impaired and threatened streams and water bodies identified by the state. No streams within the project area are listed on the current 303(d) list (MDEQ 2024c).

TVA establishes SMZs defined as areas or zones, covered with vegetation on both sides of perennial and intermittent streams and along the margins of bodies of open water, where extra precaution is used in carrying out construction activities to protect stream banks, instream aquatic habitat, and water quality. These zones also function as buffers when herbicides, fertilizers, etc.,

are applied to adjacent lands (TVA 2022). Streams would be protected by Category A streamside management zones with a 50 ft. minimum buffer. Ground disturbance would be minimized and all work to be done in accordance with best management practices (BMPs) as outlined in *A Guide for Environmental Protection and Best Management Practices for Tennessee Valley Authority Transmission Construction and Maintenance Activities*. With proper implementation of BMPs, impacts to water flow, stream banks, or stream channels would be minor.

2.6.2 Wetlands

Wetland assessments were performed in the proposed project area to ascertain wetland presence, condition, and extent to which wetland functions are provided within the proposed project area. Wetland field surveys along the Midway-S. Macon section of the project were conducted in December 2022, January through February of 2023, and the associated access roads were surveyed May 2024. Field surveys along the S. Macon-Dekalb section of the project were conducted in July through August 2023 and the associated access roads were surveyed in April and May of 2024. Eighty-eight (88) wetland areas, totaling approximately 101.59 acres, were identified within the proposed project area. These wetlands consisted of 25.41 acres of emergent, 5.69 acres of scrub-shrub (sapling dominated), and 70.49 acres of forested wetland habitat of varying levels of condition, thus providing a range of wetland function and value to the surrounding landscape. The delineated wetlands were generally identified in association with smaller to medium sized drainage features and larger floodplain bottoms. Table 4 identifies the wetland acreages and types by watershed within the project area. The combination of land-use practices and landscape position dictates the wetland habitat type, wetland functional capacity, and wetland value.

Table 4a. Acreage of Delineated Wetland Value by Watershed

Watershed (10-HUC)	NWI Estimated Total Wetland Acres in Watershed[1]	Delineated Wetland Acreage in Project Area			
		Low Value	Moderate Value	Exceptional Resource Value	TOTAL
Hashuqua Creek (0316010804)	16,140	0.82	4.85	0	**5.67**
Horse Hunters Creek-Noxubee River (0316010805)	9,840	0.83	17.22	0	**18.05**
Shuqualak Creek-Noxubee River (0316010807)	14,700	1.32	22.83	0	**24.15**
Running Water Creek-Macedonia Creek (0316010806)	6,535	8.65	0.86	0	**9.51**
Wahalak Creek (0316010808)	5,205	0.36	8.86	0	**9.23**
Bodka Creek (0316010810	23,100	16.28	13.14	0	**29.42**
Running Tiger Creek-Sucarnoochie River (0316020201)	13,485	3.17	2.40	0	**5.57**
TOTAL	**89,005**	**31.43**	**70.16**	**0.00**	**101.59**

[1]National Wetland Inventory (USFWS 1982)

Table 4b. Acreage of Delineated Wetland Habitat Type by Watershed

Watershed (10-HUC)	NWI Estimated Total Wetland Acres in Watershed	Delineated Total Wetland Acreage in Proposed Project			
		Emergent	Scrub-Shrub	Forested	TOTAL
Hashuqua Creek (0316010804)	16,140	0.82	0	4.85	**5.67**
Horse Hunters Creek-Noxubee River (0316010805)	9,840	0.83	0.89	16.33	**18.05**
Shuqualak Creek-Noxubee River (0316010807)	14,700	1.07	4.79	18.27	**24.14**
Running Water Creek-Macedonia Creek (0316010806)	6,535	6.21	0	3.30	**9.51**
Wahalak Creek (0316010808)	5,205	0	0	9.23	**9.23**
Bodka Creek (0316010810	23,100	10.91	0	18.51	**29.42**
Running Tiger Creek-Sucarnoochie River (0316020201)	13,485	5.57	0	0	**5.57**
TOTAL	**89,005**	**25.41**	**5.69**	**70.49**	**101.59**

Wooded wetland conversion to emergent habitat results in reduction in wetland function. Due to the rate of water uptake, extensive root system, and structural integrity of trees and shrubs relative to herbaceous plants, wooded wetlands function at a greater capacity to impede and hold storm water, absorb toxins, retain sediment, and provide the shaded forage and spawning habitat necessary for its aquatic and terrestrial inhabitants to exist. Therefore, conversion of this community type to a habitat devoid of woody vegetation would result in a reduction of existing functional capacity.

Activities in wetlands are regulated by state and federal agencies to ensure no net loss of wetland resources. Under the CWA Section 404, activities resulting in the discharge of dredge, fill, and associated secondary impacts to waters of the U. S., including wetlands, must be authorized by the USACE through a Nationwide, Regional, or Individual Permit. This project is located in the North Branch of the USACE Mobile District. CWA Section 401 mandates state water quality certification for projects requiring USACE approval. MDEQ is responsible for certifying CWA Section 404 permits are compliant with state water quality regulations. Mississippi's jurisdiction would apply to regulated activities affecting jurisdictional wetlands within the project area. Lastly, EO 11990 requires federal agencies to minimize wetland destruction, loss, or degradation, avoid new construction in wetlands wherever there is a practicable alternative. Efforts were made during project planning and siting to avoid wetlands to the extent practicable. However, because of project and topographic constraints, and because of the goal of minimizing impacts to other resources, no practicable alternative was available that would allow complete avoidance of wetlands.

With wetland avoidance and wetland minimization techniques in place, TVA would comply with all USACE/MDEQ mitigation requirements to compensate for the proposed loss of wetland resources, functions, and values resulting from this project. TVA would obtain the necessary Section 404/401 CWA permits and compensatory mitigation to ensure the proposed wetland impacts are compensated to the extent deemed appropriate such that wetland functions and

values remain at the current capacity within larger affected basins. Compensatory mitigation would be purchased through an approved wetland mitigation bank to ensure no more than minimal impacts to the aquatic environment result and the objectives of the CWA and federal no net loss of wetlands policy are upheld.

2.7 Soil Types

The USDA National Resources Conservation Service Soil Maps and SSURGO data for Noxubee, Winston, and Kemper Counties, MS was used to determine the soil types covered by the project. The results are shown in Appendix C. Soils within the bounds of the project footprint have low to moderate erodibility factors (K_f) ranging from 0.20 to 0.43. BMPs will be in place when ground disturbance is necessary and remain in place until permanent vegetation is reestablished.

2.8 Site Maps

Topographic maps are included in Appendix A. Because no major grading activities will occur, drainage patterns and slopes will remain essentially the same as those shown on the topographic map.

2.9 Discharge Associated with Industrial Activity Excluding Construction Stormwater

TVA will conduct no industrial activities other than construction at the site.

2.10 Buffer Zones

TVA typical stream minimum buffer widths for water bodies are shown in Table 3. Additional buffers will be added where necessitated by topography. Ground disturbance will be minimized within buffer zones. With proper implementation of SMZ buffers and BMPs, as outlined in *A Guide for Environmental Protection and Best Management Practices for Tennessee Valley Authority Transmission Construction and Maintenance Activities* no impacts would occur as a result of the proposed transmission line construction and operation. Buffer zones may be adjusted in the field based on property owner request, existing land use, topography, or obstacles including but not limited to fences, transmission structures, roadways, etc. In areas where structures are placed in wetlands temporary sediment barriers will be used to prevent sediment from leaving the vicinity of the structure.

2.11 Tennessee Valley Authority Project Contacts

Table 5. Project Contacts

Name and Title	Address	Phone Number
Jessica Lyon Project Environmental Support (PES)	1101 Market Street, BR 2C Chattanooga, TN 37402	(423) 751-2810
Karen Carmack Environmental Technician	1101 Market Street, MR 4K Chattanooga, TN 37402	(573) 776-8225
Thomas Chipley ROW Forester	1101 Market Street, MR 4K Chattanooga, TN 37402	(662) 705-3944
John Pickering Project Manager	1101 Market Street, MR 3G Chattanooga, TN 37402	(423) 751-7946

3.0 Erosion and Sediment Control Plan

Sediment control structures and best management practices (BMPs) shall be implemented where water exposed to disturbed areas shall leave the construction site as shown in Appendix B. The Environmental Technician shall consult with the PES to determine the location of sediment control structures and BMPs considering site specific topography, existing vegetation, and type of construction activity. Erosion control structures and BMPs shall be utilized to minimize erosion and sediment escape from all disturbed areas of the construction site. Any changes to the proposed location of BMPs shall be “red lined” in the SWPPP.

Unless significant re-grading of access roads is necessary, perimeter BMPs will not be required for actions that require only access to the structures described herein. Such actions include but are not limited to adding grillage surcharge, adjusting the conductor position, or hanging stringing blocks for reconductor operations.

The operator in control of their portion of the project is responsible for installing and maintaining erosion and sediment controls on this project during the access road construction phase.

3.1 Erosion and Sediment Controls

No roads will be graded by the contractor without the permission of the designated TVA representative. Grading of roads will be minimized; but when necessary, water bars and berms will be utilized to control erosion caused by runoff. Runoff will be diverted onto stabilized areas, or other devices will be used to control erosion at the outfall location.

Sediment barriers will be installed on slopes and between areas of soil disturbance and any adjacent streams, wetlands, and storm water conveyances. The type and location of BMP that do not require formal design will be determined in conjunction with the TVA field representative and at a minimum will be consistent with the guidelines contained in the MDEQ *Planning and Design Manual for the Control of Erosion, Sediment and Storm Water* or other recognized manual of design.

Off-site vehicle tracking of sediments and the generation of fugitive dust will be minimized. Appropriate measures will be taken to minimize the creation of fugitive dust including the use of water or gravel and limitations on the type of equipment, allowable speed, and routes utilized. On access road entrances that intersect public highways, gravel, wooden mats, or other means will be used on the first 50 feet of entrance to minimize the amount of sediment being tracked on to the public road. Any sediment that is tracked onto roadways will be cleaned up daily.

Soil stabilization-vegetative stabilization measures must be initiated whenever any clearing, grading, grubbing, excavating or other land disturbing activities have temporarily or permanently ceased on any portion of the site and will not resume for a period of fourteen (14) calendar days or more. The appropriate temporary or permanent vegetative practices shall be initiated immediately. For purposes of this permit, "immediately" is interpreted to mean no later than the next workday. Either temporary or permanent cover will be established on disturbed areas depending on the time of year and whether construction activities will occur in the area. Suggested seed rates and mixtures are contained in the *Guide for Environmental Protection and Best Management Practices for Tennessee Valley Authority Transmission Construction and Maintenance Activities*.

3.1.1 Basis of Design

The erosion and sediment controls shall be properly designed and maintained to retain sediment on-site for all rainfall events up to and including a 2-year, 24-hour rainfall event except in the case of Impaired or Exceptional waters where a 5-year, 24-hour rainfall event will be used.

All control measures must be properly selected, installed, and maintained in accordance with *A Guide for Environmental Protection and Best Management Practices for Tennessee Valley Authority Transmission Construction and Maintenance Activities* and good engineering practices and at a minimum shall be consistent with the guidelines contained in the MDEQ *Planning and Design Manual for the Control of Erosion, Sediment and Storm Water* or other recognized manual of design.

If sediment escapes the construction site, off-site accumulations of sediment that have not reached a stream must be removed at a frequency sufficient to minimize offsite impacts. Any sediment removed from the project will be spread on the ROW or on-site, respectively, and revegetated along with other disturbed areas.

3.1.2 Operational Construction Practices

See Appendix B for BMP Details.

Construction Exits: Off-site vehicle tracking of sediments shall be minimized. Angular gravel construction exits shall be installed at all points of egress along the project route. Construction exits are designed to reduce or eliminate the transport of mud from the construction area onto public rights-of-way by motor vehicles or runoff. Any sediment that is tracked onto a public road shall be removed with a street sweeper or similar equipment daily, spread on the ROW, and revegetated along with the other areas of disturbance. Additional stone may have to be added periodically to gravel construction entrance/exits to maintain proper functioning of the pad.

Sediment Barriers: Sediment barriers shall be installed on slopes and between areas of soil disturbance and any adjacent streams, wetlands, and storm water conveyances. Silt fence or other sediment barriers shall be installed down gradient from disturbed areas where sheet flow would leave the construction site. Sheet flow from this project is not anticipated to leave the construction site. Sediment trapped behind sediment barriers should be removed when 1/3 the height of the barrier has been reached. In no case shall accumulated sediment be allowed to reach 1/2 the height of the barrier.

Access Roads: Established access roads prevent excessive soil disturbance from vehicle and equipment traffic. For this project, temporary and/or permanent access roads shall be constructed. No roads shall be graded by the contractor without the permission of the designated TVA representative. In areas where access roads must cross wetlands, low ground pressure equipment or matting shall be used. All permanent and temporary crossings of water bodies shall be suitably culverted, bridged, or otherwise designed and constructed to maintain low flows to sustain the movement of aquatic species. Any grading of construction roads shall be minimized; but, when necessary, water bars and berms shall be utilized to control erosion caused by runoff. Runoff water shall be diverted onto stabilized areas, or other devices shall be used to control erosion at the outfall location.

3.2 Post-Construction Restoration and Stabilization Procedures

3.2.1 Post-Construction Site Restoration

In some cases, TVA only owns the rights to construct, operate, and maintain electric transmission facilities on the right-of-way. As such, TVA must comply with the property owner's wishes for the vegetative practices employed. In other cases, TVA owns the property and can stabilize the construction area with more flexibility. Generally, TVA will re-vegetate disturbed areas with like kind vegetation. In previously undisturbed areas, on TVA owned land, or in cases where the property owner has no preference as to what species are planted TVA will use the restoration practices described below.

Any remaining debris from construction will be removed from the site and properly recycled or disposed.

Vegetative Practices shall be designed to preserve existing vegetation where feasible and initiate vegetative stabilization measures after land disturbing activities. Such practices may include, but are not limited to, temporary seeding, permanent seeding, mulching, sod stabilization, vegetative buffer strips, tree protection and topsoil preservation. Soil stabilization-vegetative stabilization measures must be initiated whenever any clearing, grading, grubbing, excavating or other land disturbing activities have temporarily or permanently ceased on any portion of the site and will not resume for a period of fourteen (14) calendar days or more. The appropriate temporary or permanent vegetative practices shall be initiated immediately.

3.2.2 Restoration in Areas of Special Concern

The Tennessee Valley is home to many unique habitats that harbor species plant communities found nowhere else in the world. Due to their sensitive nature, conventional re-vegetation practices may not be appropriate. In these areas of special concern or where threatened or endangered species are denoted, TVA biological staff will be consulted prior to establishing a planting plan.

3.2.3 Temporary Stabilization

In all cases, disturbed areas will be temporarily or permanently stabilized immediately where work has ceased. For purposes of this permit, "immediately" is interpreted to mean no later than the next workday. Temporary stabilization may be achieved through seeding with annual vegetation as shown below or by using straw much. Straw may be applied by hand for small areas or with a straw blower for larger areas. Temporary straw coverage will be achieved at 70% of the disturbed area. Permanent stabilization with perennial vegetation will replace any temporary measures as soon as practicable.

3.2.4 Sampling and Amending Soils

Sampling for soil amendments such as lime or fertilizers will be taken where subsoil is exposed or where the topsoil is thin or poor. Any topsoil or fill material brought onsite will be sampled. Samples should be taken as soon as practicable after clearing and grading are complete.

Sampling Guidelines:
If different soil types exist on the site, separate samples of each type will be collected. If the soils are uniform throughout the site composite sampling will be used.

Collect a composite sample by moving through the area in a zigzag pattern, collecting sub-samples at random. Each sub-sample should be collected at a depth of 3" to 6", depending on future soil use, presence or absence of topsoil, etc.

If organic matter is present on the surface, scrape away prior to sampling, usually no more than 0.25" to 0.5" of the surface layer. Combine and thoroughly mix all sub-samples into one composite sample, using a bucket, plastic bag, or similar. Remove the amount required by the laboratory to analyze and place in a suitable container for shipment.

Applying Amendments:
Based on laboratory analysis, lime will be applied such that the soil pH rises to a level suitable for establishment of vegetation. Fertilizers will be applied as recommended by laboratory analysis.

3.2.5 Seed Selection

Table 6 below provides recommended species and seeding rates for both temporary and permanent cover. Temporary cover will be established using a mix of at least two annual species. Permanent cover will be established using a mix of at least two grasses, a legume, and a nurse crop. Actual re-vegetation practices may vary based on site conditions, seed availability, and weather. If these recommendations cannot be followed, the SWPPP preparer will be notified.

Table 6. Seed Selection

	Temporary Cover			**Permanent Cover**				
	Pick two from below			Use two grasses, Clover, and Oats or Millet				
January	**Wheat**	**Rye Grass**	**Barley**	Do not attempt Permanent Cover				
	75 lb/ac	15 lb/ac	75 lb/ac					
February	**Wheat**	**Oats**	**Barley**	**Orchard Grass**	**Tall Fescue**	**Red Top**	**White or Red Clover**	**Oats**
	75 lb/ac	75 lb/ac	75 lb/ac	10 lb/ac	10 lb/ac	3 lb/ac	2 lb/ac	25 lb/ac
March	Use Permanent Cover unless re-grading is anticipated			**Orchard Grass**	**Tall Fescue**	**Red Top**	**White or Red Clover**	**Oats**
				10 lb/ac	10 lb/ac	3 lb/ac	2 lb/ac	25 lb/ac
April				**Orchard Grass**	**Tall Fescue**	**Red Top**	**White or Red Clover**	**Oats**
				10 lb/ac	10 lb/ac	3 lb/ac	2 lb/ac	25 lb/ac
May	**Buckwheat**	**Millet**	**Sudan Grass**	**Orchard Grass**	**Tall Fescue**	**Red Top**	**White or Red Clover**	**Millet**
	25 lb/ac	10 lb/ac	20 lb/ac	10 lb/ac	10 lb/ac	3 lb/ac	2 lb/ac	5 lb/ac
June	**Buckwheat**	**Millet**	**Sudan Grass**	Do not attempt Permanent Cover				
	25 lb/ac	10 lb/ac	20 lb/ac					
July	**Buckwheat**	**Millet**	**Sudan Grass**					
	25 lb/ac	10 lb/ac	20 lb/ac					
August	**Buckwheat**	**Millet**	**Sudan Grass**	**Orchard Grass**	**Tall Fescue**	**Red Top**	**White or Red Clover**	**Millet**
	25 lb/ac	10 lb/ac	20 lb/ac	10 lb/ac	10 lb/ac	3 lb/ac	2 lb/ac	5 lb/ac
September	Use Permanent Cover unless re-grading is anticipated			**Orchard Grass**	**Tall Fescue**	**Red Top**	**White or Red Clover**	**Oats**

				10 lb/ac	10 lb/ac	3 lb/ac	2 lb/ac	25 lb/ac
October				**Orchard Grass**	**Tall Fescue**	**Red Top**	**White or Red Clover**	**Oats**
				10 lb/ac	10 lb/ac	3 lb/ac	2 lb/ac	25 lb/ac
November	**Wheat**	**Oats**	**Barley**	**Orchard Grass**	**Tall Fescue**	**Red Top**	**White or Red Clover**	**Oats**
	75 lb/ac	75 lb/ac	75 lb/ac	10 lb/ac	10 lb/ac	3 lb/ac	2 lb/ac	25 lb/ac
December	**Wheat**	**Rye Grass**	**Barley**	Do not attempt Permanent Cover				
	75 lb/ac	15 lb/ac	75 lb/ac					

3.2.6 Quality Control

The clearing contractor will provide seed mix and amendment information to the permit writer and/or the Environmental Technician upon request.

3.2.7 Permit Closure

The permit will be terminated when all land disturbing activities have been completed, temporary BMPs have been removed, and permanent vegetation uniformly covers 70% of the disturbed area. TVA will strive to close the permit near the end of the spring or fall growing season. In no case will TVA attempt permit closure after periods of prolonged drought or cold.

Records Retention

All records, reports, forms and information resulting from activities required by this permit shall be retained for a period of at least three (3) years from the date that the document(s) was generated.

3.3 Field Change Documentation

3.3.1 Minor Changes

For this document a minor change is defined as the addition of 100 feet or less of any perimeter control BMP (e.g., silt fence, wattle, etc.), the maintenance and repair of existing BMPs, or changes in the location of perimeter control BMPs of less than 20 feet to avoid topographic features or utility facilities. For minor SWPPP changes:

1. No notification to PES is required.
2. BMP drawings in the SWPPP shall be redlined and recorded in the SWPPP revision log located in Appendix E.

3.3.2 Major Changes

All other addition, subtraction, or changing of BMPs as shown in the project SWPPP and/or changes made by TVA Transmission and Substation Construction to the project (e.g. new access roads, design change, etc.) shall be coordinated with and approved by the PES. Any approved changes shall be documented on the revision log located in the SWPPP for the project. Additionally, the BMP drawings that are onsite should reflect the actual field conditions. These drawings can be red lined with changes by field personnel or a revised set may be provided by the PES.

To determine a need for additional BMPs or to discuss project changes, an onsite meeting should occur between the Environmental Technician and ROW specialist and/or Construction Technician. The location and scope of the additional work shall be determined from this meeting.

For major SWPPP changes:

1. The proposed changes shall be communicated (email or phone call) to the PES for review and approval or denial.
2. The PES shall analyze proposed changes and determine if changes are compliant with environmental regulations. Once a determination is made, the PES shall notify the Environmental Technician along with the ROW Specialist or ROW specialist and/or Substation Construction if the change is approved or denied.
3. If changes are approved, the PES shall make the necessary revision to the SWPPP which may include updating Transmission and/or Substation project information (e.g. access road maps). The PES in coordination with the Environmental Technician shall ensure all approved changes are documented in the SWPPP. This may include red lining BMP drawings and updating SWPPP revision log located in the appendix.
4. If the changes are approved the ROW specialist and/or Substation Construction shall coordinate the completion of the work with the resources that are available.

4.0 Maintenance/Inspection Procedures

The following is a summary of the erosion and sediment control maintenance and inspection measures that shall be implemented during construction activities. Any situation which arises and has not specifically been mentioned herein will be addressed according to the MDEQ *Planning and Design Manual for the Control of Erosion, Sediment and Storm Water* or other recognized manual of design.

4.1 Precipitation Measurements

Precipitation measurements shall be taken using continuous recorders or daily readings of an onsite rain gauge. Additionally, TVA may utilize *Farm Logs*, a precipitation monitoring service which provides accurate, localized rainfall data.

4.2 Regular Inspections

TVA shall ensure that regular, comprehensive site and receiving water(s) inspections are conducted as often as necessary to ensure that effective BMPs are properly designed, implemented, and consistently maintained to adequately prevent any adverse impact to surface waters.

4.2.1 Operational Inspections

- Qualified personnel will inspect all disturbed areas, material storage areas, structural control measures, locations where vehicles enter or exit the site, and storm water discharge points to ensure that erosion and sediment controls are effective in preventing significant impacts to receiving waters.

- Silt fences should be inspected for tears and depth of sediment to determine if the fabric is securely attached to the fence posts and to confirm that the fence posts and silt fence bottoms are firmly in the ground.

- Temporary and permanent seeding and planting should be inspected for bare spots, washouts, and unhealthy growth.

- Access roads should be inspected to ensure that they are adequately stabilized with gravel or seed and straw as needed. Construction exits shall be inspected to ensure that they are preventing the tracking and flow of mud onto public rights-of-way.

4.2.2 Inspector Requirements

Inspections will be performed by an individual who has experience and training in construction stormwater monitoring and inspection.

4.2.3 Inspection Frequency

During land disturbing activities inspections will be conducted at least once every calendar week for a minimum of four times per month. Inspections should also occur at all controls and outfalls after rain events that produce a discharge.

4.3 BMP Deficiencies

Any inadequate control measures or control measures in disrepair shall be replaced, modified, or repaired within 24 hours of the discovery of the deficiency or as soon as site conditions allow. Deficiencies shall be recorded per TVA deficiency reporting guidelines.

4.4 Inspection Documentation

Inspections are to be documented on the forms found in Appendix D. If necessary, the Project Description and pollution prevention measures described in this SWPPP must be revised as appropriate, but in no case later than 7 days after the inspection. Any changes required by these revisions shall be made no later than 14 days following the inspection. Inspection results will be documented on inspection report forms and retained onsite. Copies of inspection reports should be submitted to the project PES weekly.

4.5 Training

The staff training requirements will comply with ACT5, T-20 and T-21 in the large Construction General Permit (CGP). Specifically, TVA will ensure that all personnel responsible for upholding the conditions and requirements of this permit will understand any requirements of the permit that may be affected by the work they are asked to perform. Members of the stormwater team will understand the following, as related to their job duties: permit deadlines associated with installation, maintenance, and removal of stormwater controls and with stabilization; the location of all stormwater controls on the site required by this permit and how they are to be maintained; the proper procedures to follow with respect to the permit's pollution prevention requirements; and when and how to conduct inspections, record applicable findings, and take corrective actions. Pursuant to ACT5, T-20 and T-21 of the large CGP, Table 6 lists the qualified individuals responsible for identifying, coordinating, and carrying out compliance activities associated with the project discussed herein.

5.0 Storm Water Pollution Controls

5.1 Waste

5.1.1 Waste Materials

Any generated solid waste will be properly collected, stored, recycled and/or disposed. All trash and construction debris from the site will be hauled to an approved landfill. No construction waste material will be buried on the site. Employee waste and other loose materials will be collected and properly disposed to prevent the release of floating materials during storm events.

5.1.2 Hazardous Waste

No hazardous waste is expected to be generated or encountered in this project. If hazardous waste is encountered, the project PES will be consulted. All hazardous waste materials will be disposed of according to EPA, state and/or local regulations.

5.1.3 Sanitary Waste

Portable sanitary units will be provided for use by all workers throughout the life of the construction project. All sanitary waste will be regularly collected from the portable units by a licensed sanitary waste management contractor.

5.1.4 Concrete Waste

Concrete that is delivered to the site but remains unused shall be transported offsite by the concrete vendor. (i.e., in no case shall waste concrete be disposed of on the ground at the construction site). Concrete trucks can use properly designed and designated concrete washout BMP areas to clean their mixer chute if necessary. It is not permissible to discharge concrete wash directly onto the ground or within 50 feet of streams, storm drains or areas with potential for runoff directly into streams and/or storm drains.

5.2 Product Specific Practices

5.2.1 Petroleum Products

All on-site vehicles will be monitored for leaks and will receive regular preventative maintenance to reduce the chance of leakage. If petroleum products are present at the site, they will be stored in tightly sealed containers which are clearly labeled.

5.3 Spill Prevention

5.3.1 Equipment

Materials and equipment necessary for spill cleanup will always be present on the site. Equipment and materials will include but not be limited to brooms, shovels, rags, absorbent materials, and plastic or metal trash containers specifically designed for this purpose. The materials and equipment necessary for spill cleanup will be dependent upon the nature and quantity of the material stored on site.

5.3.2 Response

All spills will be stabilized immediately upon discovery and cleaned up as soon as practicable. Spills shall be documented per TVA procedures.

5.3.3 Safety

The spill area will be kept well ventilated, and personnel will wear appropriate protective clothing to prevent injury from contact with hazardous substances.

5.4 Off-Site Sediment and Dust Control

Off-site tracking of sediments and the generation of dust shall be minimized. At locations where vehicles and equipment exit the site onto paved roads, a gravel construction exit will be provided to minimize off-site tracking of sediment. Mud, dirt, or rock tracked from the site onto paved roadways will be cleaned up daily and spread on the ROW or on-site. These areas will be revegetated along with other areas of disturbance as the project progresses.

6.0 Non-Storm Water Discharge

The following items are prohibited non-stormwater discharges:

1. Wastewater from washout of concrete (unless managed by an appropriate control).
2. Wastewater from washout and cleanout of stucco, paint, form release oils, curing compounds, and other construction materials.
3. Fuels, oils, or other pollutants used in vehicle and equipment operation and maintenance.
4. Soaps or solvents used in vehicle and equipment washing.
5. Wastewater from sanitary facilities, including portable toilets.
6. Dewatering activities including discharges from dewatering of trenches and excavations unless managed by BMPs.

It is not expected that any non-storm water discharges will occur on the construction site.

7.0 Stormwater Management Controls

The project will be managed to reduce any exposed soil areas during the life of the project. Temporary vegetative cover will be used until permanent cover can be established on exposed soil areas.

8.0 Other Environmental Permits

Documentation of other environmental permits may be found in the appendix if applicable.

8.1 U.S. Army Corps of Engineers Permits

TVA submitted a Pre-Construction Notice (PCN) to the U.S. Army Corps of Engineers (USACE), Mobile District. The project was assigned file number SAM-2024-01119.

8.2 Other State Permits

No other state permits are required for this project.

8.4 Local Permits

No local permits are required for this project.