
To: Tennessee Valley Authority
Chattanooga, TN

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File: Updated GWPS and SSLs at the Allen
Fossil Plant East Ash Disposal Area
CCR Unit

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**Reference: Update on Statistically Significant Levels (SSLs) (40 CFR § 257.95(g)) - CCR Rule
Groundwater Monitoring - Allen Fossil Plant, East Ash Disposal Area CCR Unit**

In accordance with the federal regulations for management of coal combustion residuals (CCR Rule; 40 CFR § 257, Subpart D), the Tennessee Valley Authority (TVA) is currently conducting Assessment Monitoring at the East Ash Disposal Area CCR Unit at its Allen Fossil Plant (ALF) in Memphis, Tennessee. The East Ash Disposal Area consists of one CCR surface impoundment subject to the CCR Rule with a single-unit groundwater monitoring system.

As required by the CCR Rule, the owner or operator of a CCR unit shall establish groundwater protection standards (GWPS) for Appendix IV parameters detected during Assessment Monitoring and determine if one or more Appendix IV parameters are detected at statistically significant levels (SSLs) above their GWPS. GWPS for all Appendix IV parameters were originally established and documented in a notice dated October 15, 2018 as required by 40 CFR § 257.95(d)(2) and are provided on Table 1.

As part of ongoing Assessment Monitoring, the first semiannual assessment monitoring event for 2021 occurred January 12-15, 2021 with the additional “resample” event occurring February 8-10, 2021. This technical memorandum presents GWPS and lower confidence bands (LCBs) that have been updated with data collected during the first semiannual monitoring event and resample event for 2021, as well as any identified SSLs after incorporating the additional data collected in 2021. The identification of SSLs was performed as a two-step process:

1. Historical sampling results (November 2016 through February 2021) for Appendix IV parameters from each downgradient well were compared directly to the updated GWPS. If sample concentrations were below the updated GWPS, no SSLs over the GWPS were identified.
2. Where the direct comparison indicated a concentration above the GWPS, further statistical analysis was performed to identify levels statistically greater than the GWPS, using procedures recommended in the United States Environmental Protection Agency (USEPA) Unified Guidance for Statistical Analysis of Groundwater Monitoring Data at RCRA Facilities (EPA 530/R-09-007; March 2009). Comparisons were made against a fixed GWPS via LCBs. For each situation where a parameter concentration was greater than the GWPS in step one, the 99% LCB of the fitted line in that monitoring well was calculated using CCR Rule monitoring data collected from November 2016 through February 2021. As recommended in the Unified Guidance, where the 99% LCB exceeds the GWPS at the last sampling event an SSL was identified for the constituent/well pair.

Based on the statistical analysis performed in 2021, there continues to be SSLs above the GWPS for arsenic in wells AFL-202, ALF-203, and ALF-204, for lead in well ALF-203, and for molybdenum in wells ALF-202 and ALF-203. However, unlike during 2018, there was not an SSL over the GWPS for fluoride in ALF-203 or molybdenum in ALF-205. TVA will continue to conduct groundwater monitoring and reporting pursuant to 40 CFR § 257.95.

Reference: Update on Statistically Significant Levels (SSLs) at the Allen Fossil Plant - East Ash Disposal Area CCR Unit

TABLE 1: Statistically Significant Levels Above GWPS - ALF East Ash Disposal Area CCR Unit

Appendix IV Parameter	GWPS (a)	Updated GWPS (b)	Downgradient wells with analytical results above GWPS (c)	Updated LCBs (d)	SSL LCB > GWPS (e)
Antimony (mg/l)	0.006	0.006	None	NA	NA
Arsenic (mg/l)	0.0176	0.0106	ALF-202	0.398	Yes
			ALF-203	0.869	Yes
			ALF-204	0.032	Yes
			ALF-212	0.010	No
			ALF-213	0.006	No
Barium (mg/l)	2	2	None	NA	NA
Beryllium (mg/l)	0.004	0.004	None	NA	NA
Cadmium (mg/l)	0.005	0.005	None	NA	NA
Chromium (mg/l)	0.1	0.1	None	NA	NA
Cobalt (mg/l)	0.006	0.006	None	NA	NA
Fluoride (mg/l)	4	4	ALF-202	2.59	No
			ALF-203	2.89	No
Lead (mg/l)	0.015	0.015	ALF-203	0.019	Yes
Lithium (mg/l)	0.04	0.04	None	NA	NA
Mercury (mg/l)	0.002	0.002	None	NA	NA
Molybdenum (mg/l)	0.1	0.1	ALF-201 ^(f)	0.0	No
			ALF-202	0.240	Yes
			ALF-203	0.377	Yes
			ALF-205	0.030	No
Radium-226+228 (pCi/l)	5	5	None	NA	NA
Selenium (mg/l)	0.05	0.05	None	NA	NA
Thallium (mg/l)	0.002	0.002	None	NA	NA

NA – Not applicable

- (a) GWPS documented in notice dated 10/15/2018 [reported in milligrams per liter (mg/L)]
- (b) GWPS updated as of 5/13/2021 with two additional sample results collected on January 12-15, 2021 and February 8-10, 2021 [reported in mg/L]
- (c) Downgradient wells with analytical results above GWPS November 2016 through February 2021 (per 40 CFR § 257.95(b) and (d))
- (d) Most recent value of 99% lower confidence band (LCB) on the mean of Appendix IV groundwater sampling events between November 2016 and February 2021. Upper confidence band (UCB) not shown as it is greater than LCB.
- (e) SSL: “statistically significant level” over GWPS occurs when the updated LCB value at the last sampling event exceeds the updated GWPS
- (f) Negative lower confidence band values were reported as 0.0 mg/L