

July 9, 2020

Tennessee Valley Authority
1101 Market Street
Chattanooga, Tennessee 37402

**Notification of Closure Completion
Stilling Pond 2C and Sluice Channel
EPA Final CCR Rule
TVA Bull Run Fossil Plant
Clinton, Tennessee**

1.0 PURPOSE

This letter provides notification of closure completion of the Stilling Pond 2C and Sluice Channel at the Bull Run Fossil Plant, and AECOM's certification of the closure.

Stilling Pond 2C and the Sluice Channel are considered one CCR unit under the federal CCR Rule. These units were closed sequentially, not concurrently. The closure of the entire CCR unit is now deemed to be complete since both portions of the unit have been closed. Consequently, this notice of closure completion addresses the closure completion of the entire CCR unit.

2.0 NOTIFICATION OF CLOSURE COMPLETION

Pursuant to 40 C.F.R. § 257.102(h), the following notification has been prepared for the CCR Unit (i.e., Stilling Pond 2C and Sluice Channel). The Sluice Channel portion of the CCR Unit was closed in 2017. A final cover system consisting of a geomembrane liner and a vegetative cover was utilized for the closure of the Sluice Channel.

On June 9, 2020, closure was completed for the Stilling Pond 2C at the Bull Run Fossil Plant in accordance with the closure plan developed per 40 CFR 257.102(b). Stilling Pond 2C was closed and re-purposed into a process water pond known as Process Water Basin 1 (PWB1). This was accomplished by removing CCR from the pond floor down to the original subgrade, overexcavating 12 inches of clay from the original subgrade, re-establishing and re-grading the pond floor using imported clay material, and placing the liner system over the prepared subgrade. Material sampling and testing was conducted to confirm the removal of CCR from the pond floor subgrade, after removal of CCR from the pond floor and again after removal of 12 inches of the original clay. The liner system used was the Alternative Final Cover System, per 40 CFR 257.102(d)(3)(ii).¹ A new primary spillway and an emergency spillway were also constructed to function as the outlets for PWB1.

¹ TVA is performing an environmental investigation of the CCR units at the Bull Run Fossil Plant site under the oversight of the Tennessee Department of Environment and Conservation (TDEC). Consequently, TVA is working with TDEC to determine the state-approved closure methodology for this CCR Unit. Upon completing the state process, TVA may need to update the closure methodology for this CCR Unit.

As required by 40 CFR 257.102(h), this notification of closure has been prepared, including the certification of completion of closure, by a qualified professional engineer [per 40 CFR 257.102(f)(3)], and placed in the facility's operating record [per 40 CFR 257.105(i)(8)].

3.0 QUALIFIED PROFESSIONAL ENGINEER CERTIFICATION

I, Thomas A. Kovacic, being a Professional Engineer in good standing in the State of Tennessee, do hereby certify, to the best of my knowledge, information, and belief:

1. that the information contained in this certification is prepared in accordance with the accepted practice of engineering;
2. that the information contained herein is accurate as of the date of my signature below; and
3. that the Stilling Pond 2C and Sluice Channel at the Bull Run Fossil Plant have been closed in accordance with the closure plan developed per 40 CFR 257.102(b).
4. that the designs of the final cover systems for Stilling Pond 2C and the Sluice Channel meet the requirements of 40 CFR 257.102(d)(3).



SIGNATURE:

DATE 07-09-2020

ADDRESS: AECOM
1300 E. 9th Street, Suite 500
Cleveland, OH 44114

TELEPHONE: (216) 622-2300

ATTACHMENTS: None