



Stantec Consulting Services Inc.
3052 Beaumont Centre Circle, Lexington KY 40513-1074

June 4, 2018
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Revision 1

Tennessee Valley Authority
1101 Market Street
Chattanooga, Tennessee 37402

**Re: Initial Hazard Potential Classification Assessment
Fly Ash Stilling Pond 2C and Sluice Channel
EPA Final Coal Combustion Residuals (CCR) Rule
TVA Bull Run Fossil Plant
Clinton, Tennessee**

1.0 PURPOSE

This letter documents Stantec Consulting Services Inc.'s (Stantec) certification of the initial hazard potential classification assessment for the TVA Bull Run Fossil Plant's Fly Ash Stilling Pond 2C and Sluice Channel. The EPA Final CCR Rule requires owners or operators of CCR surface impoundments to conduct initial and periodic hazard potential classification assessments of the unit, assign one of three potential hazard classification ratings to it, and provide the basis for the rating, as per 40 CFR 257.73(a)(2). Hazard potential classification ratings define the consequences in the event of a failure – *the ratings have nothing to do with the likelihood of failure or the structural stability of the impoundment*. Based on this assessment, the Fly Ash Stilling Pond 2C and Sluice Channel has been assigned a significant hazard potential classification rating.

2.0 BASIS FOR CLASSIFICATION RATING

As described in the attached assessment report, the hazard potential classification rating of "significant" was assigned to the Fly Ash Stilling Pond 2C and Sluice Channel because a failure or mis-operation would result in no probable loss of human life, but could cause economic loss, environmental damage, disruption of lifeline facilities, or impact other concerns. In 2013, Stantec reviewed the hazard potential classification of Fly Ash Stilling Pond 2C and Sluice Channel. It was determined that a breach of the impoundment would not likely result in loss of life. However, a breach would likely result in the release of CCR materials to Bullrun Creek or the Clinch River. Review of the analysis and current conditions at the Fly Ash Stilling Pond 2C and Sluice Channel concluded that the existing hazard classification was applicable.

3.0 SUMMARY OF FINDINGS

The attached report presents the analysis for the initial hazard potential classification assessment. The results demonstrate that the impoundment meets the hazard potential classification of "significant."



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4.0 QUALIFIED PROFESSIONAL ENGINEER CERTIFICATION

I, John S. Montgomery, 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 initial hazard potential classification assessment for the TVA Bull Run Fossil Plant's Fly Ash Stilling Pond 2C and Sluice Channel meets the requirements specified in 40 CFR 257.73(a)(2).

SIGNATURE

John S. Montgomery

DATE

June 4, 2018

ADDRESS:

Stantec Consulting Services Inc.
3052 Beaumont Centre Circle
Lexington, Kentucky 40513-1703

TELEPHONE:

(859) 422-3000

ATTACHMENTS:

Initial Hazard Potential Classification Assessment

