

**Bull Run Fossil Plant
Main Ash Pond, Fly Ash Stilling Pond 2C and Sluice Channel
Location Restriction Demonstrations
April 16, 2020**

In 2009, TVA adopted a coal ash management program to convert coal combustion residuals (CCR) from wet impoundments to dry storage (i.e., lined landfills or beneficial reuse) and to close wet ash impoundments. When the EPA's "Disposal of Coal Combustion Residuals from Electric Utilities" final rule (CCR Rule) became effective in October 2015, TVA had ceased sending CCR material to the Bull Run Fossil Plant's Main Ash Pond, Fly Ash Stilling Pond 2C and Sluice Channel. As a result, and due to TVA's notification of its plan to close the units in accordance with the early closure provision of the rule which has since been vacated, these units are called "inactive CCR surface impoundments" and are now subject to the deadlines set forth in 40 CFR § 257.100. Under the CCR Rule, TVA must discontinue sending non-CCR wastestreams to these impoundments by the CCR Rule deadline set forth in 40 CFR 257.101.¹ Closure of the Main Ash Pond, Fly Ash Stilling Pond 2C and Sluice Channel will be performed in accordance with the CCR Rule and applicable state law requirements.

TVA is not posting demonstrations associated with the CCR location restrictions per 40 C.F.R. §§ 257.60-257.64. Under the CCR Rule at 40 C.F.R. § 257.100(e)(2)(ii) and § 257.101(b), the result of TVA not posting these demonstrations is that TVA must cease sending wastewater flows to these impoundments by the CCR Rule deadline, and initiate closure in accordance with 40 C.F.R. § 257.102. As noted above, TVA is already planning to take this action.

Although TVA is not posting location restriction demonstrations, TVA is working with the Tennessee Department of Environment and Conservation (TDEC) to investigate the environmental conditions at Bull Run Fossil Plant. These studies include evaluations of the groundwater and site hydrogeologic conditions, groundwater chemistry, structural and seismic stability evaluations, and characterization of the CCR. The results of these studies will be documented in an Environmental Assessment Report, which will contain a comprehensive evaluation of site conditions. TVA has completed an Environmental Impact Statement under the National Environmental Policy Act (NEPA) to study closure options. Following these studies, and in cooperation with TDEC, the method of closure for the impoundments will be determined.

TVA is committed to serving the people of the Tennessee Valley through its mission of providing low-cost reliable power, environmental stewardship and economic development. This commitment includes protecting human health, caring for the environment, and complying with all applicable environmental regulations while safely managing coal ash at our plants.

¹ EPA has proposed a rule which if finalized will establish August 31, 2020, as the deadline to stop sending wastestreams to, and initiate closure of, all unlined surface impoundments. See 84 Fed. Reg. 65941 (Dec. 2, 2019) (proposed rule). Accordingly, TVA must cease sending wastewater flows to these impoundments by August 31, 2020 (assuming the proposed rule will be finalized), and initiate closure in accordance with 40 C.F.R. § 257.102.