



AECOM
1375 Euclid Ave. Suite 600, Cleveland, OH 44115

December 15, 2015

Tennessee Valley Authority
1101 Market Street
Chattanooga, Tennessee 37402

**Reference: Notification of Intent to Initiate Closure – Inactive CCR Surface Impoundment
EPA Final CCR Rule (40 CFR §257.100)
Main Ash Pond
TVA Bull Run Fossil Plant
Clinton, Tennessee**

1.0 PURPOSE

The purpose of this document is to provide notice of the intent to initiate closure under 40 CFR § 257.100(b) of the inactive Main Ash Pond at the Bull Run Fossil Plant.

2.0 NARRATIVE DESCRIPTION OF CLOSURE ACTIVITIES

Closure of the Main Ash Pond as describe herein is subject to the satisfactory completion of the NEPA environmental review performed by TVA after the submission of this notice of intent. The following general tasks are anticipated as part of the closure process.

Plant waste water will be diverted around the Main Ash Pond by the use of pipes or a geomembrane lined channel for treatment in Stilling Pond 2C under the existing NPDES permit. The Main Ash Pond will be graded to positively drain by the regrading of the existing in-place ash material and the addition of onsite or offsite fill material. Once the subgrade has been graded, an engineered cap system will be installed over the Main Ash Pond.

The engineered cap will consist of the following materials, listed in order of construction (from bottom to top):

- 40-mil geomembrane,
- Geocomposite drainage layer,
- 24 inches of cover soil, of which the top 6 inches are capable of supporting vegetation,
- Vegetation

The design of the final cover system will meet the CCR Rule standards, and any agreed upon, site-specific state requirements. The final cap system design and construction will accommodate settling to preserve the cap system's integrity.

3.0 SCHEDULE FOR COMPLETING CLOSURE ACTIVITIES

Any schedule dates and duration timelines for construction activities are tentative and subject to change. The only date subject to a critical deadline is the completion of closure date by April 17, 2018, as stated in 40 CFR § 257.100 (b). The tentative schedule for closure activities includes:

- Waste water flow relocation: February 2016 – May 2016
- Site subgrade construction: June 2016 – December 2016
- Final cover system placement: December 2016 – June 2017



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- Site grading and seeding/establishment of vegetation: June 2017 to September 2017
- April 17, 2018 – deadline for completion of closure activities.

4.0 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 that the information contained in this certification is prepared in accordance with the accepted practice of engineering. I certify pursuant to 40 CFR 257.100 (b)(4) that the design of the final cover system defined herein meets the requirements in 40 CFR § 257.100 (b)(3) (i). I further certify pursuant to 40 CFR § 257.100 (b) (6) that the closure of the CCR surface impoundment under 40 CFR § 257.100 (b)(1) through (4), as described herein, is technically feasible within the timeframe in 40 CFR §257.100 (b) of 40 CFR § 257.100.

SIGNATURE:

DATE

12/15/15

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