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To:	Tennessee Valley Authority Chattanooga, TN	From:	Matthew Dagon, LPG Indianapolis, IN
File:	Updated GWPS and SSLs Cumberland Fossil Plant Stilling Pond CCR Unit	Date:	July 31, 2020

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**Reference: Update on Statistically Significant Levels (SSLs) - CCR Rule Groundwater Monitoring Cumberland Fossil Plant, Stilling Pond (including Retention Pond)**

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 Stilling Pond (including Retention Pond) CCR Unit at its Cumberland Fossil Plant (CUF) in Cumberland, Tennessee. The Stilling Pond (including Retention Pond) consists of one CCR surface impoundment subject to the CCR Rule with a single-unit monitoring system.

As required by the CCR Rule (40 CFR § 257.95(g)), the owner or operator of a CCR unit shall establish groundwater protection standards (GWPSs) 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 GWPSs. GWPSs 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 2020 occurred January 28-29, 2020, with the additional “resample” event occurring March 10-11, 2020. This technical memorandum presents GWPSs and lower confidence bands (LCBs) that have been updated with data collected during the first semiannual monitoring event and resample event for 2020, as well as any identified SSLs after incorporating the additional data collected in 2020. The identification of SSLs was performed as a two-step process:

1. Historical sampling results (November 2016 through March 2020) for Appendix IV parameters from each downgradient well were compared directly to the GWPS. If all 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 March 2020. 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 2020, there continues to be an SSL above the GWPS for arsenic in well CUF-206. This is the same SSL at the same well as was previously identified. TVA will continue to conduct groundwater monitoring and reporting pursuant to 40 CFR § 257.95.

Reference: Update on Statistically Significant Levels (SSLs) at the Cumberland Fossil Plant - Stilling Pond CCR Unit

**TABLE 1: Statistically Significant Levels Above GWPSs - CUF Stilling Pond**

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)	0.01	0.01	CUF-206	0.0112	<b>Yes</b>
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	CUF-208	0.0044	<b>No</b>
Fluoride (mg/l)	4	4	None	NA	NA
Lead (mg/l)	0.015	0.015	None	NA	NA
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	None	NA	NA
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) GWPSs documented in notice dated 10/15/2018

(b) GWPSs updated as of 06/19/2020 with results from two additional sampling events collected from Wells CUF-201 and CUF-202 on January 28, 2020 and March 10, 2020

(c) Downgradient wells with analytical results above GWPS November 2016 through March 2020 (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 March 11, 2020. 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