

19 July, 2019

Tennessee Valley Authority
1101 Market Street
Chattanooga
Tennessee, 37402-2801

**Subject: Post-Closure Plan – 40 CFR § 257.104(d)(4)
Tennessee Valley Authority Gallatin Fossil Plant – Ash Pond Complex
Sumner County, Tennessee**

Revision Log

| Revision or Change Number | Date Placed into Operating Record | Affected Page Numbers | Description of Revision/Change |
|---------------------------|-----------------------------------|-----------------------|--|
| 0 | 10/12/16 | All | Initial Plan |
| 1 | 7/19/19 | All | Updated Plan reflecting closure-by-removal |

1. Purpose

This letter documents the revised Post-Closure Plan for the Tennessee Valley Authority's Gallatin Fossil Plant (GAF) coal combustion residuals (CCR) surface impoundments in general accordance with the United States Environmental Protection Agency's (USEPA) Disposal of Coal Combustion Residuals from Electric Utilities Rule (CCR Rule). The CCR surface impoundments at GAF consist of the Ash Pond Complex (APC) which is comprised of Ash Pond A, Ash Pond E, Middle Pond A, and the Bottom Ash Pond. The initial Post-Closure Plan was prepared on October 16, 2016, pursuant to 40 CFR 257.104(d)(1) and (d)(2).

2. Post-Closure Plan

The closure of the APC is subject to the completion of all necessary environmental reviews. TVA is currently reviewing the closure of the APC and intends to prepare an Environmental Impact Statement (EIS) that will address the alternatives of closure-by-removal of the APC to an on-site landfill and/or to a beneficial re-use facility with the potential for some unusable CCR to be disposed of in an on-site or off-site landfill in accordance with applicable state and federal laws. As reflected in the current Closure Plan, and subject to the completion of the EIS, the method of closure proposed for the APC is closure-by-removal pursuant to 40 CFR § 257.102(c). Therefore, the post-closure care requirements set forth in 40 CFR § 257.104 do not apply per § 257.104(a)(2), which is provided below.

40 CFR § 257.104(a)(2). *An owner or operator of a CCR unit that elects to close a CCR unit by removing CCR as provided by § 257.102(c) is not subject to the post-closure care criteria under this section.*

3. Closing

Because the APC will be closed following a closure-by-removal approach, there is no requirement for post-closure care per 40 CFR § 257.104(a)(2) and no certification is required. Other requirements set forth in the CCR rule will be followed pending CCR surface impoundment closure, if applicable.

SIGNATURE:



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ATTACHMENTS N/A