

October 11, 2021

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

**Subject: Engineer's Certification of 2021 Periodic Structural Stability Assessment
Ash Pond A
Tennessee Valley Authority Gallatin Fossil Plant
Gallatin, Tennessee**

1.0 PURPOSE

The purpose of this document is to certify that the Tennessee Valley Authority (TVA) Gallatin Fossil Plant (GAF) Ash Pond A is in compliance with the structural stability requirements specified in 40 CFR § 257.73(d) of the United States Environmental Protection Agency (USEPA) Coal Combustion Residuals Rule (CCR Rule). According to 40 CFR § 257.73(f), a periodic structural stability assessment is required five years from the posting of the initial structural stability assessment in the unit's Operating Record. The initial structural stability assessment was placed in the facility's operating record on October 14, 2016.

2.0 SUMMARY OF FINDINGS

Annual inspections of CCR facilities at the plant including Ash Pond A have been completed since 2016 with the most recent on July 29, 2021 (TVA, 2021). It was noted that a good stand of grass is generally maintained on the slopes of the perimeter dikes, adequate impoundment freeboard was observed, routine maintenance activities are ongoing including maintaining vegetation, no evidence of sinkholes or depressions were observed, no global slope instability was observed, and outlet structures and drainage pipes were generally in good condition with no damage observed due to fluctuations in the stilling pond levels at the toe of the dike.

Ash Pond A has ceased to receive CCR and non-CCR waste streams. A siphon system was previously used to maintain lowered water levels in Ash Pond A, but they are not required to pass the design storm event and are no longer being used. Although the siphon system is no longer in use, it does not cause any significant changes that would create any additional loading conditions on the perimeter dikes, outlet structures, or drainage pipes succeeding the initial structural stability assessment. Therefore, Ash Pond A remains in compliance with the structural stability requirements in the CCR Rule.

3.0 CERTIFICATION

I, David Skeggs, 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 has been prepared in accordance with the accepted practice of engineering; that the information contained herein is accurate as of the date of my signature below; and that Ash Pond A meets the requirements of 40 CFR § 257.73(d).

SIGNATURE: David Skeggs DATE: October 11, 2021
David Skeggs, PE

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Raleigh, NC 27607

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REFERENCES: AECOM (2016), *Tennessee Valley Authority - Ash Pond A, Middle Pond A, Bottom Ash Pond, Initial Structural Stability Assessment 40 CFR 257.73(d)(1), Existing CCR Surface Impoundments, TVA Gallatin Fossil Plant (Rev0)*, October 12, 2016.

TVA (2021), *2021 Annual Inspection of CCR Facilities, Gallatin Fossil Plant, Gallatin, Sumner County, Tennessee*, July 29, 2021.

