

Date: July 9, 2021

To: Tennessee Valley Authority

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Subject: Statistically Significant Levels (SSLs), March 2021 Assessment Monitoring
CCR Rule Groundwater Monitoring
Gallatin Fossil Plant, Ash Pond Complex

In accordance with federal regulations for management of coal combustion residuals (the CCR Rule; 40 CFR 257), the Tennessee Valley Authority (TVA) is monitoring groundwater at the Ash Pond Complex at its Gallatin Fossil Plant (GAF) in Gallatin, Tennessee. The Ash Pond Complex consists of four surface impoundments subject to the CCR Rule: Ash Pond A, Ash Pond E, Middle Pond A, and the Bottom Ash Pond. All four impoundments are monitored together under a multi-unit monitoring system. The Ash Pond Complex is currently in the Assessment phase of monitoring.

Pursuant to 40 CFR 257.95(g), this memorandum serves as notification to identify the constituents in Appendix IV that have statistically significant levels (SSLs) above groundwater protection standards (GWPSs; see **Table 1**).

The first semi-annual Assessment monitoring event of 2021 at the Ash Pond Complex took place in March 2021. Verification sampling was performed in May 2021 to confirm one of the March 2021 results. The identification of SSLs was performed as a two-step process:

1. At each downgradient well, the sampling result for each Appendix IV parameter was compared directly to the GWPS. This comparison was based on the May verification sampling results (where available) or March results where verification sampling was not conducted. Where the concentration was below the GWPS, no SSL was 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 USEPA's Unified Guidance for Statistical Analysis of Groundwater Monitoring Data at RCRA Facilities (EPA 530/R-09-007; March 2009). For each situation where the concentration was greater than the GWPS, the 95% upper and lower confidence levels (UCL, LCL, respectively) on the mean concentration in that monitoring well were calculated using CCR Rule monitoring data for the two most recent years (i.e., April 2019 to March 2021 plus the verification samples where available) to provide a statistical dataset. As recommended in the Unified Guidance, where both the UCL and LCL exceed the GWPS, SSLs were identified.

The identified SSLs above GWPSs are presented on **Table 1**. Three of these SSLs were previously identified; the SSL for arsenic in GAF-450L is new. Alternate Source Demonstrations have been completed for two of these SSLs (cobalt and lithium) as described in the 2019 Annual Report.

**Table 1: Statistically Significant Levels (SSLs) Above GWPSs, March 2021
GAF Ash Pond Complex**

Appendix IV Parameter	GWPS (a)	Downgradient wells with results above GWPSs (b)	Calculated LCL on the mean (c)	SSL (d) LCL>GWPS
Antimony (mg/l)	0.006	None	NA	NA
Arsenic (mg/l)	0.010	GAF-410U	0.0268	Yes
		GAF-450L	0.0102	Yes
Barium (mg/l)	2	None	NA	NA
Beryllium (mg/l)	0.004	None	NA	NA
Cadmium (mg/l)	0.005	None	NA	NA
Chromium (mg/l)	0.100	None	NA	NA
Cobalt (mg/l)	0.006	GAF-450L	0.00714	Yes (e)
Fluoride (mg/l)	4	None	NA	NA
Lead (mg/l)	0.015	None	NA	NA
Lithium (mg/l)	Carters: 0.045	GAF-452C	0.0930	Yes (e)
	Lebanon: 0.189	None	NA	NA
Mercury (mg/l)	0.002	None	NA	NA
Molybdenum (mg/l)	0.100	None	NA	NA
Radium-226+228 (pCi/l)	5	None	NA	NA
Selenium (mg/l)	0.050	None	NA	NA
Thallium (mg/l)	0.002	None	NA	NA

NA – Not applicable

(a) GWPSs documented in notice dated 10/15/2018.

(b) Semi-annual Assessment monitoring event in March 2021 with results from verification sampling in May 2021 where available.

(c) Lower confidence limit (LCL) on the mean of CCR Rule sampling events between April 2019 and March 2021 plus the May 2021 verification sample results where available. Upper confidence limit (UCL) not shown as it is greater than LCL.

(d) SSL is statistically significant level over GWPS.

(e) Successful Alternate Source Demonstrations completed, see 2019 Annual Report.