

October 11, 2021

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

**Subject: Engineer's Certification of 2021 Periodic Safety Factor Assessment
Middle 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) Middle Pond A is in compliance with the factors of safety specified in 40 CFR § 257.73(e) of the United States Environmental Protection Agency (USEPA) Coal Combustion Residuals Rule (CCR Rule). According to 40 CFR § 257.73(f)(3), a periodic safety factor assessment is required five years from the posting of the initial safety factor assessment in the unit's Operating Record. The initial safety factor assessment was placed in the facility's operating record on October 12, 2016.

2.0 SUMMARY OF FINDINGS

Annual inspections of CCR facilities at the plant including Middle Pond A have been completed since 2016 with the most recent on July 29, 2021. AECOM reviewed available inspection reports, topographic and geotechnical data for the TVA Gallatin Fossil Plant's Middle Pond A and reviewed the initial safety factor assessment performed in 2016 by AECOM and Geocomp. The initial safety factor assessments conducted pursuant to 40 CFR 257.73(e) addressed the following factors of safety:

- Long-term, maximum storage pool loading condition;
- Maximum surcharge pool loading condition;
- Seismic factor of safety loading condition; and
- Liquefaction factor of safety loading condition.

Based upon review of these available documents, there have not been any changes that would adversely impact the results of the initial safety factor assessment. The unit has ceased receiving CCR and non-CCR waste streams, which positively impacts factors of safety by lowering normal water levels. Therefore, the initial safety factor assessment remains valid and Middle Pond A remains in compliance with the safety factor 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 Middle Pond A meets the requirements of the factors of safety specified in 40 CFR 257.73(e).

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

ADDRESS: 5438 Wade Park Boulevard, Suite 200
Raleigh, NC 27607

TELEPHONE: 919-461-1100

REFERENCES: AECOM, 2016. *Initial Safety Factor Assessment, Middle Pond A, TVA Gallatin Fossil Plant, October 7, 2016.*
TVA, 2019. Topographic contours developed from TVA surveying, May 30, 2019.

