

October 11, 2021

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

**Subject: Engineer’s Certification of 2021 Periodic Inflow Design Flood Control System Plan  
Middle Pond A  
Tennessee Valley Authority Gallatin Fossil Plant  
Sumner County, Tennessee**

---

**1.0 PURPOSE**

The purpose of this document is to provide the periodic inflow design flood control system plan and associated certification for the Tennessee Valley Authority (TVA) Gallatin Fossil Plant (GAF) Middle Pond A in compliance with 40 CFR § 257.82 of the United States Environmental Protection Agency (USEPA) Coal Combustion Residuals Rule (CCR Rule). According to 40 CFR § 257.82(c), a periodic inflow design flood control system plan is required five years from the posting of the initial flood control system plan in the unit’s Operating Record. The initial flood control system plan was posted to the unit’s Operating Record on October 12, 2016.

**2.0 BACKGROUND**

As described in 40 CFR 257.82(c), an inflow design flood control system plan must be prepared to document how the inflow design flood control system has been designed and constructed to manage the design storm required by the hazard classification. Based on the 2021 Periodic Hazard Potential Classification Assessment, Middle Pond A should continue to be classified as a low hazard potential CCR surface impoundment. Thus, the 100-year storm event utilized in the initial inflow design flood control system plan is still appropriate. Discharges from the unit are managed in accordance with the facility National Pollutant Discharge Elimination System (NPDES) Permit TN0005428.

**3.0 SUMMARY OF FINDINGS**

AECOM compiled and reviewed available topographic and hydrologic data for the TVA Gallatin Fossil Plant’s Middle Pond A and reviewed the initial inflow design flood control system plan performed in 2016 by AECOM. Based upon its review of the available documents, there have not been any changes that would adversely impact the results of the initial inflow design flood control system plan. The unit ceased receiving CCR and non-CCR waste streams, which positively impacts the storage capacity of the unit. Therefore, the initial inflow design flood control system plan remains valid. Middle Pond A safely passes the design storm flows with adequate freeboard and remains in compliance with the requirements set forth in 40 CFR 257.82(a) and (b). Below is a summary of the findings from the initial study.

<b>Plant</b>	<b>Facility</b>	<b>Inflow Design Storm</b>	<b>Maximum Water Surface Elevation (feet)</b>	<b>Minimum Embankment Elevation (feet)</b>
GAF	Middle Pond A	100 year	473.0	474.0

#### 4.0 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 this periodic inflow design flood control system plan was conducted in accordance with the requirements of 40 CFR 257.82.

SIGNATURE:   
David Skeggs, PE

DATE: October 11, 2021

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

TELEPHONE: 919-461-1100

REFERENCES: Initial Inflow Design Flood Control System Plan, Middle Pond A, Gallatin Fossil Plant, Sumner County, Tennessee, October 7, 2016.

2021 Periodic Hazard Potential Classification Assessment, Middle Pond A, Gallatin Fossil Plant, Sumner County, Tennessee, October 11, 2021.

