
To: Tennessee Valley Authority
Chattanooga, TN

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File: Updated GWPS and SSLs at the
Johnsonville Fossil Plant Active Ash
Pond 2 CCR Unit

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Reference: End of Year Update on Statistically Significant Levels (SSLs) (40 CFR § 257.95(g)) - CCR Rule Groundwater Monitoring - Johnsonville Fossil Plant, Active Ash Pond 2 CCR Unit

In accordance with the federal regulations for management of coal combustion residuals (CCR Rule; 40 Code of Federal Regulations [CFR] Part 257, Subpart D), the Tennessee Valley Authority (TVA) is currently conducting Assessment Monitoring at the Active Ash Pond 2 CCR Unit at its Johnsonville Fossil Plant (JOF) in New Johnsonville, Tennessee. The Active Ash Pond 2 consists of one CCR surface impoundment subject to the CCR Rule with a single-unit groundwater monitoring system.

As required by the CCR Rule, the owner or operator of a CCR unit shall establish groundwater protection standards (GWPS) for Appendix IV parameters detected during Assessment Monitoring and determine if one or more Appendix IV parameters are detected at statistically significant levels (SSLs) above their GWPS. GWPS for all Appendix IV parameters were originally established and documented in a notice dated October 15, 2018, as required by 40 CFR § 257.95(d)(2) and are provided on Table 1.

As part of ongoing Assessment Monitoring, the second semiannual assessment monitoring event for 2023 occurred July 24-27, 2023, with the additional "resample" event occurring September 5-8, 2023. This technical memorandum presents GWPS and lower confidence bands (LCBs) that have been updated with data collected during the second semiannual monitoring event and resample event for 2023, as well as any identified SSLs after incorporating the additional data collected in 2023. The identification of SSLs was performed as a two-step process:

1. Historical sampling results (November 2016 through September 2023) for Appendix IV parameters from each downgradient well were compared directly to the GWPS. If all sample concentrations were below the updated GWPS, no SSLs over the GWPS were 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 United States Environmental Protection Agency (USEPA) Unified Guidance for Statistical Analysis of Groundwater Monitoring Data at RCRA Facilities (EPA 530/R-09-007, March 2009). Comparisons were made against a fixed GWPS via LCBs. For each situation where a parameter concentration was greater than the GWPS in step one, the 99% LCB of the fitted line in that monitoring well was calculated using CCR Rule monitoring data collected from November 2016 through September 2023. As recommended in the Unified Guidance, where the 99% LCB exceeds the GWPS at the last sampling event, an SSL was identified for the constituent/well pair.

Based on the statistical analysis performed in 2023, there continues to be SSLs above the GWPS for cobalt in wells 10-AP3 and JOF-103. These are the same SSLs at the same wells as was previously identified. TVA will continue to conduct groundwater monitoring and reporting pursuant to 40 CFR § 257.95.

Reference: End of Year Update on SSLs (40 CFR § 257.95(g)) – CCR Rule Groundwater Monitoring - Johnsonville Fossil Plant - Active Ash Pond 2 CCR Unit

TABLE 1: Statistically Significant Levels Above GWPS - JOF Active Ash Pond 2 CCR Unit

Appendix IV Parameter	GWPS (a)	Updated GWPS (b)	Downgradient wells with analytical results above GWPS (c)	Updated LCBs (d)	SSL LCB > GWPS (e)
Antimony (µg/L)	6	6	JOF-104	1.1	No
Arsenic (µg/L)	10	10	None	NA	NA
Barium (µg/L)	2,000	2,000	None	NA	NA
Beryllium (µg/L)	4	4	None	NA	NA
Cadmium (µg/L)	5	5	10-AP3	2.5	No
			JOF-103	3.3	No
Chromium (µg/L)	100	100	None	NA	NA
Cobalt (µg/L)	6	6	10-AP3	25.3	Yes
			JOF-103	41.5	Yes
Fluoride (mg/L)	4	4	None	NA	NA
Lead (µg/L)	15	15	None	NA	NA
Lithium (µg/L)	40	40	JOF-103	8.7	No
Mercury (µg/L)	2	2	None	NA	NA
Molybdenum (µg/L)	100	100	None	NA	NA
Radium-226+228 (pCi/L)	5	5	None	NA	NA
Selenium (µg/L)	50	50	None	NA	NA
Thallium (µg/L)	2	2	None	NA	NA

NA – Not applicable

- (a) GWPS documented in notice dated October 15, 2018 [reported in milligrams per liter (µg/L) except fluoride (mg/L) and radium 226+228 (pCi/L)]
- (b) GWPS updated as of December 12, 2023, with results from two additional sampling events collected on July 24-27, 2023, and September 5-8, 2023 [reported in µg/L except fluoride (mg/L) and radium 226+228 (pCi/L)]
- (c) Downgradient wells with analytical results above GWPS November 2016 through September 2023 (per 40 CFR § 257.95(b) and (d))
- (d) Most recent value of 99% LCB on the mean of Appendix IV groundwater sampling events between November 2016 and September 2023. Upper confidence band (UCB) not shown as it is greater than LCB [reported in µg/L]
- (e) SSL: “statistically significant level” over GWPS occurs when the updated LCB value at the last sampling event exceeds the updated GWPS