



December 15, 2015
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Tennessee Valley Authority
1101 Market Street
Chattanooga, Tennessee 37402

**Reference: Notification of Intent to Initiate Closure – Inactive CCR Surface Impoundment
EPA Final CCR Rule (40 CFR §257.100)
Bottom Ash Pond
TVA John Sevier Fossil Plant
Rogersville, Tennessee**

1.0 PURPOSE

The purpose of this document is to provide notice of intent to initiate closure under 40 CFR § 257.100(b) of the inactive Bottom Ash Pond (BAP) at the John Sevier Fossil Plant.

2.0 NARRATIVE DESCRIPTION OF CLOSURE ACTIVITIES

Closure of the BAP will require modification of the current pond system. Subject to the satisfactory completion of environmental reviews, the following general tasks are anticipated as part of the closure process.

The design of the final cover system will meet the CCR Rule standards, and any agreed upon, site-specific state requirements. An engineered cap system will be constructed over the BAP sediment consolidated on the east side of the BAP. The engineered cap will consist of the following materials, listed in order of construction (from bottom to top):

- A minimum of 18 inches of compacted soil with a maximum permeability of 1×10^{-5} cm/s,
- A minimum of 6 inches of soil capable of sustaining vegetation and reasonably free from deleterious matter that would prevent the formation of a suitable seedbed.

If the selected borrow materials are not sufficiently impermeable, or if there is not a sufficient quantity, then a synthetic geomembrane will be included in the final cap design. This alternative cap system will consist of the following materials, listed in order of construction (bottom to top):

- 40-mil geomembrane,
- Geocomposite drainage layer,
- 24 inches of cover soil, of which the top 6 inches are capable of supporting vegetation.

The final cap system design will accommodate settling and subsidence so to preserve the cap system's integrity.

Cover soil will be placed to the required elevations to properly drain stormwater runoff. Vegetation will be established across the site.



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3.0 SCHEDULE FOR COMPLETING CLOSURE ACTIVITIES

Any schedule dates and duration timelines for construction activities are tentative and subject to change. The only date subject to a critical deadline is the completion of closure date by April 17, 2018 as stated in 40 CFR § 257.100 (b). The tentative schedule for closure activities includes:

- Present-June 2016 – Closure design review and planning of closure activities.
- June 2016-April 2017 – Site preparation.
- April 2017-January 2018 – Construction of the engineered cap system and placement of final cover.
- January-February 2018 – Site grading for proper stormwater drainage, and seeding/establishment of vegetation.
- April 17, 2018 – Deadline for completion of closure activities.

4.0 QUALIFIED PROFESSIONAL ENGINEER CERTIFICATION

I, Don Fuller, 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 is prepared in accordance with the accepted practice of engineering. I certify pursuant to 40 CFR 257.100 (b)(4) that the design of the final cover system meets the requirements in 40 CFR § 257.100 (b)(3). I further certify pursuant to 40 CFR § 257.100 (b) (6) that the closure of the CCR surface impoundment under 40 CFR § 257.100 (b)(1) through (4) is technically feasible within the timeframe stated in 40 CFR §257.100 (b).

SIGNATURE: Don W. Fuller II DATE 12/15/2015
Don W. Fuller II

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