



December 15, 2015
File: let_001_175665013

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)
Stilling Pond
TVA Kingston Fossil Plant
Harriman, 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 Stilling Pond located at the Kingston Fossil Plant.

2.0 NARRATIVE DESCRIPTION OF CLOSURE ACTIVITIES

Subject to the satisfactory completion of the required NEPA environmental reviews, the Stilling Pond will be closed by first constructing a bridging layer (Zone 1) to cover ash and to provide increased bearing capacity for equipment during construction. The next layer (Zone 2) will consist of select soils compacted by heavy equipment. Upon completion, Zone 2 will be proof rolled and observed for pumping, rutting and deformation. Once it passes the proof roll, it will be prepared for liner placement.

The design of the final cover system will meet the CCR Rule standards, and any agreed upon, site-specific state requirements. The final cover (liner system) is currently planned to be a modified TDEC defined closure system consisting of geotextile cushion, 40 mil LLDPE liner, geocomposite and two feet of soil cover. This cover will be vegetated. As an alternate, the cover system may consist of Closure Turf installed at the final grade elevation rather than the vegetated cap system noted above.

Given the large footprint, restricted crest height (in order to tie in to the Kingston Recovery Project), and normal pool level of Watts Bar Lake, the final cover will be relatively flat across the site (minimum one to two percent slopes). The drainage system consists of ditches, flumes, culverts, and pipes that will be constructed to convey surface water run-on from the Kingston Recovery Project, runoff from the closed Stilling Pond and collect and convey infiltration through the vegetative cover.

The final cap system design will address stability and settlement issues.

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:



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- Present-February 2017 – Closure design, review of design documents, and planning of closure activities.
- March 2017-November 2017 – Begin backfill and stabilization.
- November 2017-January 2018 – Construction of final cap and cover.
- February 2018 – Site grading for proper stormwater drainage, and seeding/establishment of vegetation on final cover.
- 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:  DATE 12/15/2015
Don W. Fuller II

ADDRESS: 1409 North Forbes Road, Lexington, KY 40511-2024

TELEPHONE: (859) 422-3000

REGISTRATION NO. 113120