

## TECHNICAL MEMORANDUM

**TO:** Tennessee Valley Authority

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**FILE:** Updated GWPS and SSLs at the Shawnee Fossil Plant Ash Pond 2 and Consolidated Waste Dry Stack (CCR Unit)

**DATE:** December 20, 2024

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**REFERENCE: 2024 YEAR-END UPDATE ON STATISTICALLY SIGNIFICANT LEVELS (SSLs) –  
CCR RULE GROUNDWATER MONITORING – SHAWNEE FOSSIL PLANT CCR UNIT**

In accordance with the federal regulations for management of coal combustion residuals (CCR Rule; 40 CFR Part 257, Subpart D), the Tennessee Valley Authority (TVA) is currently conducting Assessment Monitoring at the Ash Pond 2 (Main Ash Pond and Stilling Pond) and Consolidated Waste Dry Stack (CCR Unit) at its Shawnee Fossil Plant (SHF) in Paducah, Kentucky.

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 2024 occurred June 18, 2024. A resample event was conducted on July 30-31, 2024. This technical memorandum presents GWPS and lower confidence bands (LCBs) that have been updated with data collected during the second semiannual 2024 monitoring event, as well as any identified SSLs after incorporating the additional data collected in 2024. The updated GWPS has been calculated using data collected at the background well (SHF-102G) from November 2016 through July 2024. To statistically evaluate the Appendix IV constituents, concentration data are compared to the GWPS through the use of confidence bands. In assessment monitoring, a well is determined to be out of compliance and has an SSL when the lower confidence band (LCB), and thus the entire confidence interval, exceeds the GWPS, as discussed in the *Unified Guidance*. If the compliance data at a given well-constituent pair show evidence of a significant trend, a linear regression line will be fit to the data and a confidence band (one-sided) with a 99% confidence level will be constructed around the trend line. To evaluate compliance with regulatory standards, the lower edge of the confidence band and the most recent sampling event will be compared to the GWPS. If the lower edge exceeds the GWPS at that point in time (thus guaranteeing the entire vertical cross-section of the band also exceeds the GWPS at that point), an SSL will be recorded. If the lower edge of the confidence band does not exceed the GWPS, no SSL has occurred. As new sampling events are collected, the trend evaluation will be updated along with the confidence band.

Based on the statistical analysis performed for the second half of 2024, a single SSL of molybdenum at monitoring well D-74B above the GWPS was identified. This is consistent with prior monitoring events. TVA will continue to conduct groundwater monitoring and reporting pursuant to 40 CFR § 257.95.

**TABLE 1: Statistically Significant Levels Above GWPS at the CCR Unit**

Appendix IV Parameter	Original 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	None	NA	NA
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	None	NA	NA
Chromium (µg/L)	100	100	None	NA	NA
Cobalt (µg/L)	6	6	None	NA	NA
Fluoride (µg/L)	4,000	4,000	None	NA	NA
Lead (µg/L)	15	15	None	NA	NA
Lithium (µg/L)	40	40	None	NA	NA
Mercury (µg/L)	2	2	None	NA	NA
Molybdenum (µg/L)	105.3	100	D-74B	114.72	<b>Yes</b>
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) Original GWPS documented in notice dated October 15, 2018
- (b) GWPS updated as of July 2024, with results from two additional sampling event collected on June 18 and July 30-31, 2024
- (c) Downgradient wells with second semiannual 2024 results above the current GWPS using a direct-value comparison
- (d) Most recent value of 99% lower confidence band (LCB) on the mean of Appendix IV groundwater sampling events between November 2016 and July 2024. Upper confidence band (UCB) not shown as it is greater than LCB
- (e) SSL: “statistically significant level” over GWPS occurs when the updated LCB value at the last sampling event exceeds the updated GWPS