Stantec Consulting Services Inc.
3052 Beaumont Centre Circle, Lexington KY 40513-1074

May 8, 2026
File: rpt_001_let_175578700
Revision 0

Tennessee Valley Authority
1101 Market Street
Chattanooga, Tennessee 37402

Re: Initial Hazard Potential Classification Assessment
Ash Pond Complex
EPA Legacy Coal Combustion Residuals (CCR) Rule
TVA Widows Creek Fossil Plant
Stevenson, Alabama

1.0 PURPOSE

This letter documents Stantec Consulting Services Inc.'s (Stantec) certification of the initial hazard potential classification assessment for the Widows Creek Fossil Plant Ash Pond Complex. The EPA Legacy CCR Rule requires owners or operators of legacy CCR surface impoundments to conduct initial and periodic hazard potential classification assessments of the unit, assign one of three potential hazard classification ratings to it, and provide the basis for the rating, as per 40 CFR 257.73(a)(2). Hazard potential classification ratings define the consequences in the event of a failure – *the ratings have nothing to do with the likelihood of failure or the structural stability of the Impoundment*. Based on this assessment, the Ash Pond Complex has been assigned a low hazard potential classification rating.

2.0 BASIS FOR CLASSIFICATION RATING

As described in the attached assessment report, the hazard potential classification rating of "low" was assigned to the Ash Pond Complex because failure or mis-operation would result in no probable loss of human life, and potential impacts would likely be minor and principally limited to TVA property.

3.0 SUMMARY OF FINDINGS

The attached report presents the analysis for the initial hazard potential classification assessment. The results demonstrate that the legacy CCR surface impoundment meets the hazard potential classification of "low" as per 40 CFR 257.53.

Re: Initial Hazard Potential Classification Assessment
Ash Pond Complex
EPA Legacy Coal Combustion Residuals (CCR) Rule
TVA Widows Creek Fossil Plant
Stevenson, Alabama

4.0 QUALIFIED PROFESSIONAL ENGINEER CERTIFICATION

I, Robert Fuller, being a Professional Engineer in good standing in the State of Alabama, do hereby certify, to the best of my knowledge, information, and belief:

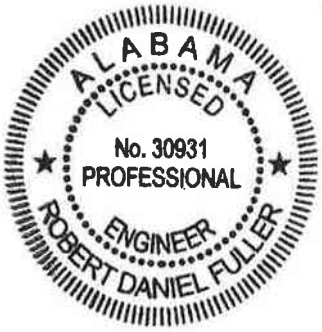
1. that the information contained in this certification is prepared in accordance with the accepted practice of engineering;
2. that the information contained herein is accurate as of the date of my signature below; and
3. that the initial hazard potential classification assessment for the TVA Widows Creek Fossil Plant's Ash Pond Complex meets the requirements specified in 40 CFR 257.73(a)(2).

SIGNATURE Robert D. Fuller DATE 5/8/2026

ADDRESS: Stantec Consulting Services Inc.
3052 Beaumont Centre Circle
Lexington, Kentucky 40513-1703

TELEPHONE: (859) 422-3000

ATTACHMENTS: Initial Hazard Potential Classification Assessment



Initial Hazard Potential Classification Assessment

Ash Pond Complex, Widows Creek Fossil Plant, Stevenson, Alabama

Stantec

Prepared for:
Tennessee Valley Authority

Prepared by:
Stantec Consulting Services Inc.

Date:
May 8, 2026

Project/File:
175578700

Stantec Consulting Services Inc.

Table of Contents

List of Appendices

1 Rating

The Ash Pond Complex at the Widows Creek Fossil Plant (WCF) is regulated under 40 CFR § 257 Subpart D as a legacy CCR surface impoundment. 40 CFR § 257.100(f)(2)(iii) of the EPA Legacy CCR Rule requires that a hazard potential classification assessment be prepared and placed in the facility's operating record by May 8, 2026.

Hazard potential classifications are based on the consequences of failure or mis-operation and are not a measure of the condition of the unit. The applicable hazard potential classifications are defined in the EPA Legacy CCR Rule § 257.53 as follows:

(1) High hazard potential CCR surface impoundment means a diked surface impoundment where failure or mis-operation will probably cause loss of human life.

(2) Significant hazard potential CCR surface impoundment means a diked surface impoundment where failure or mis-operation results in no probable loss of human life, but can cause economic loss, environmental damage, disruption of lifeline facilities, or impact other concerns.

(3) Low hazard potential CCR surface impoundment means a diked surface impoundment where failure or mis-operation results in no probable loss of human life and low economic and/or environmental losses. Losses are principally limited to the surface impoundment owner's property.

Based on these definitions, the Ash Pond Complex is classified as a low hazard potential legacy CCR surface impoundment.

This report contains supporting documentation for the Hazard Potential Classification Assessment. The hazard potential classification for this unit was determined by a review of available data.

2 Basis of Rating

2.1 Introduction

WCF is located in Stevenson, Alabama at the confluence of Widows Creek and the Tennessee River. The plant is located on the west bank of the Tennessee River, approximately 40 miles southwest of Chattanooga, Tennessee. The WCF Plant is an inactive facility that ceased power generation in September 2015 and is currently not in use. The former coal plant has been decommissioned and demolished and the site hosts no power production activities of any kind. The Ash Pond Complex, which contains the Ash Pond, Upper and Lower Ash Stilling Ponds, and Dredge Cell, is a legacy CCR surface impoundment as defined in EPA's regulations at 40 CFR § 257.53. The Ash Pond Complex is approximately 1,200 feet north of the former plant footprint. A site overview figure is included in the appendix. Closure of the legacy CCR surface impoundment was completed in November 2018. The facility no longer functions as an impoundment.

Closure of the Ash Pond Complex included construction of a geosynthetic cap system, placement of cover soil, establishment of vegetation, and construction of stormwater ditches and outfalls. The unit was closed in accordance with the State of Alabama solid waste regulations. At this time, the facility has established vegetation that is maintained with riprap lined ditches and stormwater features.

2.2 Source Data

The following information was used to perform the hazard assessment of the Ash Pond Complex:

- 2023 aerial imagery provided by TVA
- 2022 lidar survey performed by Tuck Mapping Solutions Inc.

2.3 Potential Failure Scenario

The unit is closed and no longer impounds water. Therefore, a typical breach analysis is not appropriate. It is anticipated that any sloughing that may occur would likely be limited in size, could be mitigated, and any off-site release would be de minimis.

2.4 Hazard Classification

Findings of this review and assessment demonstrate that a breach of the Ash Pond Complex would result in no probable loss of human life. In addition, it is Stantec's opinion that impacts associated with a failure would be principally limited to TVA's property. Therefore, the Ash Pond Complex fits the definition for a low hazard potential legacy CCR surface impoundment as defined in the EPA Legacy CCR Rule § 257.53.

3 References

1. EPA. (2024). Title 40 Code of Federal Regulations Part 257. Hazardous and Solid Waste Management System: Disposal of Coal Combustion Residuals from Electric Utilities; Legacy CCR Surface Impoundments. May 8, 2024.

2. TVA Aerial Imagery, August 2023.

3. Lidar Survey. Tuck Mapping Solutions Inc. June 2022.

Appendix A
Site Overview Figure

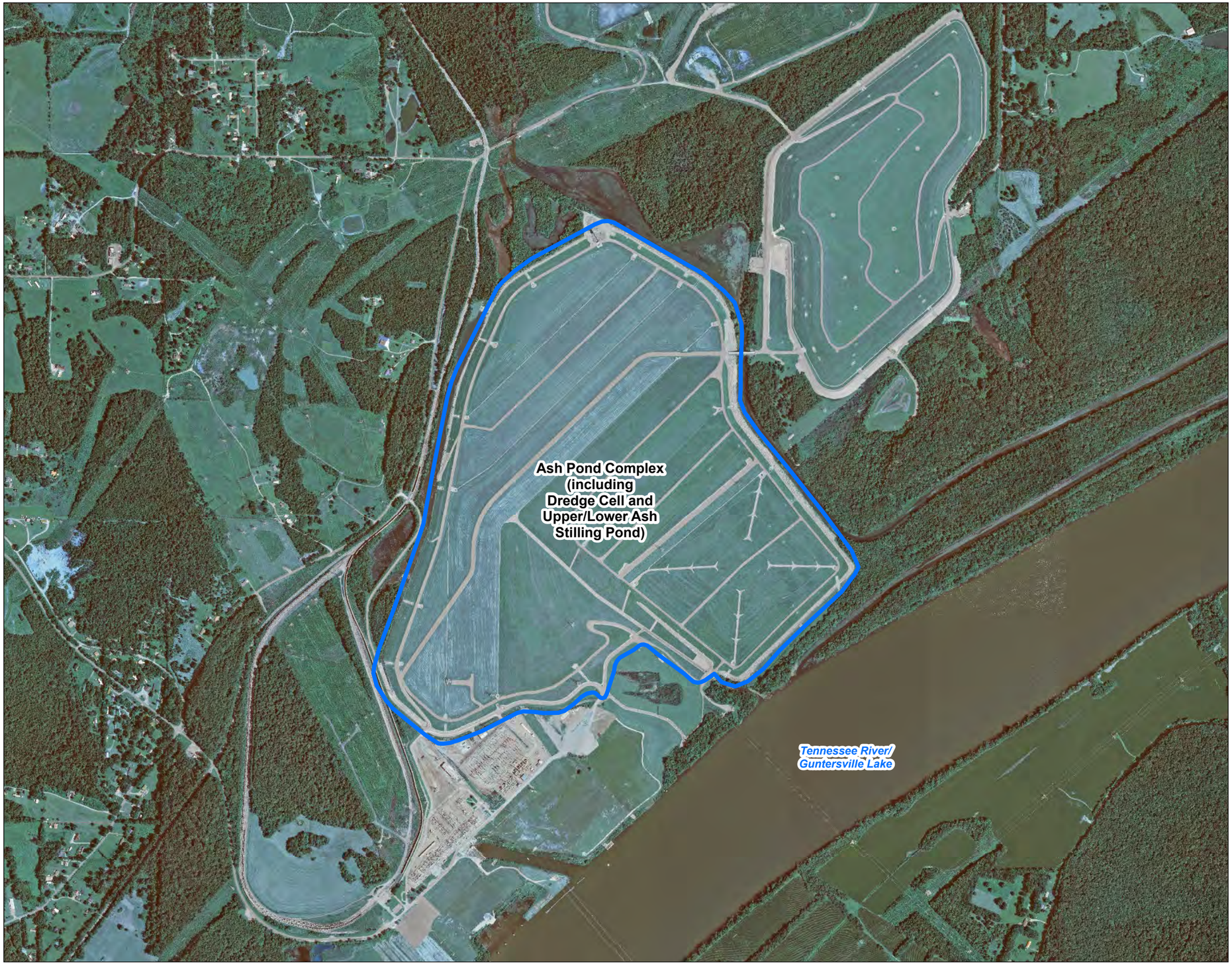


Exhibit No.

1

Title

Site Overview
WCF - Ash Pond Complex

Client/Project 175578700

Tennessee Valley Authority
Widows Creek Fossil Plant (WCF)
Initial Hazard Potential Classification Assessment

Project Location
Jackson County, Alabama

Prepared by DMB on 2026-04-20
Technical Review by CC on 2026-04-20

N

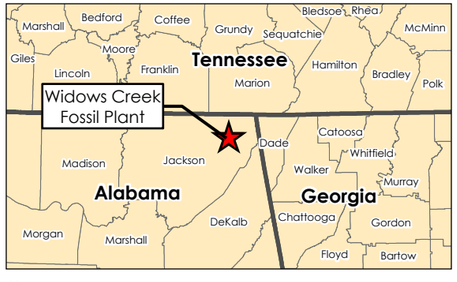
0 1,100 2,200 Feet

(At original document size of 11x17)
1:13,200

Legend

Unit Area Description

Legacy Surface Impoundment (Approximate)



Notes

1. Coordinate System: NAD 1983 2011 StatePlane Alabama East (ftUS)
2. Background: Imagery Provided by TVA (2023)

Stantec TVA