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April 13, 2018

Tennessee Valley Authority
1101 Market Street
Chattanooga, TN 37402

**Closure and Post Closure Plan
Fly Ash Stilling Pond 2C and Sluice Channel
EPA Final CCR Rule
TVA Bull Run Fossil Plant
Clinton, Tennessee**

1.0 PURPOSE

This letter documents AECOM's certification of the closure and post-closure plan for the TVA Bull Run Fossil Plant's Fly Ash Stilling Pond 2C and Sluice Channel.

2.0 CLOSURE AND POST-CLOSURE PLAN

The Closure Plan describes the steps necessary to close the Fly Ash Stilling Pond 2C and Sluice Channel at any time during the life of the Fly Ash Stilling Pond 2C and Sluice Channel, and is subject to the requirements described in 40 CFR §257.102(b). The Post-Closure Plan describes the monitoring and maintenance activities to be performed during the post-closure period of Fly Ash Stilling Pond 2C and Sluice Channel, and is subject to the requirements of 40 CFR §257.104(d).

3.0 SUMMARY OF FINDINGS

The attached closure and post-closure plan demonstrates compliance with the requirements set forth in 40 CFR §§ 257.102(b) and 257.104(d).

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4.0 CERTIFICATION

I, Thomas Kovacic PE, being a Professional Engineer in good standing in the State of Tennessee, 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;
3. that the closure plan for the TVA Bull Run Fossil Plant's Fly Ash Stilling Pond 2C and Sluice Channel meet(s) the requirements described in 40 CFR 257.102(b) and
4. that the post-closure plan for the TVA Bull Run Fossil Plant's Fly Ash Stilling Pond 2C and Sluice Channel meet(s) the requirements of 40 CFR 257.104(d).

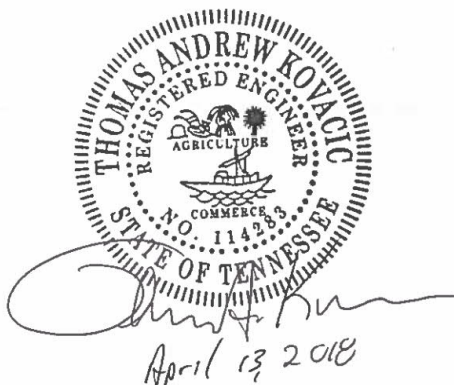
SIGNATURE _____

DATE 4-13-2018

ADDRESS: AECOM
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TELEPHONE: (216)-622-2300

ATTACHMENTS: Closure (40 CFR 257.102(b)(1)) and Post-Closure Plan (40 CFR 257.104(d)(1)) for Coal Combustion Residuals (CCR)



COAL COMBUSTION PRODUCT DISPOSAL PROGRAM
Tennessee Valley Authority – Bull Run Fossil Plant (BRF)
Stilling Pond 2C and Sluice Channel
Anderson County, Tennessee

**CLOSURE (40 CFR 257.102(b)(1)) AND
POST-CLOSURE PLAN ((40 CFR 257.104(d)(1))
FOR COAL COMBUSTION RESIDUALS (CCR)
INACTIVE SURFACE IMPOUNDMENTS**

Prepared for



Tennessee Valley Authority
1101 Market Street
Chattanooga, TN 37402-2801

April 13, 2018

Prepared by

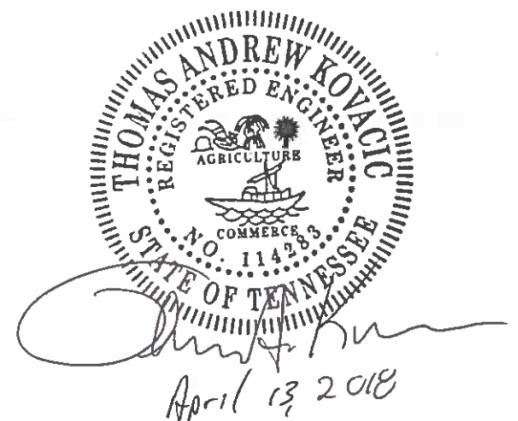




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1.0 Introduction

This Coal Combustion Residual (CCR) Rule closure and post-closure plan is conceptual and is subject to the completion of all necessary environmental reviews. It describes the CCR closure and post-closure activities at the TVA Bull Run Fossil Plant (BRF) to demonstrate that Stilling Pond 2C is currently in the process of being closed, and the Sluice Channel was closed after the lined process water Conveyance Ditch was constructed and put into service in 2017 in accordance with the CCR closure and post-closure requirements of 40 CFR § 257.102 and 104, respectively.

2.0 Written Closure Plan - 40 CFR § 257.102(b)(1)

40 CFR § 257.102(b)(1). *Written Closure Plan – (1) Content of the Plan. The owner or operator of a CCR unit must prepare a written closure plan that describes the steps necessary to close the CCR unit at any point during the active life of the CCR unit consistent with recognized and generally accepted good engineering practices. The written closure plan must include, at a minimum, the information specified in paragraphs (b)(1)(i) through (vi) of this section.*

- (i) A narrative description of how the CCR unit will be closed in accordance with this section.*
- (ii) If closure of the CCR unit will be accomplished through the removal of CCR from the CCR unit, a description of the procedures to remove the CCR and decontaminate the CCR unit in accordance with paragraph (c) of this section.*
- (iii) If closure of the CCR unit will be accomplished by leaving CCR in place, a description of the final cover system, designed in accordance with paragraph (d) of this section, and the methods and procedures to be used to install the final cover. The closure plan must also discuss how the final cover system will achieve the performance standards specified in paragraph (d) of this section.*
- (iv) An estimate of the maximum inventory of CCR ever on-site over the active life of the CCR unit.*
- (v) An estimate of the largest area of the CCR unit ever requiring a final cover as required by paragraph (d) of this section at any time during the CCR unit's active life.*
- (vi) A schedule for completing all activities necessary to satisfy the closure criteria in this section, including an estimate of the year in which all closure activities for the CCR unit will be completed. The schedule should provide sufficient information to describe the sequential steps that will be taken to close the CCR unit, including identification of major milestones such as coordinating and obtaining necessary approvals and permits from other agencies, the dewatering and stabilization phase of CCR surface impoundment closure, or installation of the final cover system, and the estimate timeframes to complete each step or phase of CCR unit closure.*



2.1 Closure Activities- § 257.102(b)(1)(i)

The BRF Stilling Pond 2C is being closed by removal and repurposed as Process Water Basin 1 (PWB1). PWB1 will be used during post-closure to assist in treatment of non-CCR process water from the plant. See **Exhibit 1** in **Appendix A** for the BRF Closure Schematics.

Stilling Pond 2C is scheduled to be closed in fiscal year 2018. Prior to closure, the pond will be decanted, and sediment on the pond floor will be removed in accordance with the grading plan and specifications, dried and disposed of at the BRF permitted facility. Closure activities include, but are not limited to, decanting, excavation, disposal of excavated material at the permitted facility, subgrade preparation, liner placement, final cover system installation, and site remediation.

Final Closure of Stilling Pond 2C is anticipated to include the following general tasks:

- Installing erosion and sediment controls;
- Diverting flows to the Main Fly Ash Pond via pumping, and installing new turbidity curtains within the Main Fly Ash Pond;
- Decanting Stilling Pond 2C;
- Excavating, staging, and drying and of existing material removed from Stilling Pond 2C, and ultimately disposing of material into the existing Dry Fly Ash Stack Lateral Expansion (landfill) on the BRF site;
- Re-grading and compaction of materials from within Stilling Pond 2C as necessary to achieve the design grades;
- Installation of drainage layer and liner system within Stilling Pond 2C;
- Installation of permanent stormwater control structures;
- Erosion protection within and around the Process Water Pond 1 (PWB1) using stone riprap.

The Sluice Channel was closed and capped with a geomembrane liner system and a vegetative cover in 2017. The Sluice Channel spanned approximately 5 acres and was closed after the lined process water Conveyance Ditch was constructed and put into service.

2.2 Closure Type/Closure in Place - § 257.102(b)(1)(iii)

The closure of Stilling Pond 2C, which will be repurposed as PWB1, will be accomplished by closure by removal.

The Sluice Channel was closed and capped with a geomembrane liner system and a vegetative cover. The work was completed in October of 2017.

2.3 Maximum CCR Inventory - § 257.102(b)(1)(iv)

The estimated maximum inventory of CCR ever on-site for Stilling Pond 2C is approximately 51,000 CY of accumulated solids. All the CCR, plus one foot of clay will be removed from the



bottom of Stilling Pond 2C and disposed of at the permitted landfill. Total volume of material anticipated to be removed is approximately 70,000 cubic yards.

Wet sluicing activities ceased in 2015 at BRF. Therefore, no additional CCR will accumulate within the impoundment.

2.4 Largest Area Requiring Final Cover - § 257.102(b)(1)(v)

The estimated largest area requiring a final cover of Stilling Pond 2C is approximately 10 acres.

The Sluice Channel was closed and capped with a geomembrane liner system that covers approximately 5 acres.

2.5 Schedule of Closure Activities - § 257.102(b)(1)(vi)

The Sluice Channel was closed and capped with a geomembrane liner system and a vegetative cover in 2017. The following sequential steps were necessary for completing the closure activities of 40 CFR § 257.102 and their completion dates are provided in Table 1: Schedule of Closure Activities

Table 1: Schedule of the Sluice Channel Closure Activities

	Closure Activity	Estimated Date
1.	Preliminary Planning, Design, and Regulatory Agency Permitting	2016
2.	Decanting, Subgrade Stabilization, and Mass Grading	2016-2017
3.	Final Cover Installation	2017
4.	Completion of closure	2017
5.	Completion of post-closure period	2047

The following sequential steps are necessary for completing the closure activities of 40 CFR § 257.102 and their estimated scheduled completion dates are provided in **Table 2: Schedule of Stilling Pond 2C Closure Activities**. The closure of Stilling Pond 2C schedule is subject to change due to contractor availability, subsurface conditions, weather, equipment, and available material resources.



Table 2: Schedule of Stilling Pond 2C Closure Activities

	Closure Activity	Estimated Date
1.	Preliminary Planning, Design, and Regulatory Agency Permitting	In Progress
2.	Decanting, Subgrade Stabilization, and Mass Grading	2017-2018
3.	Final Cover Installation	2018
4.	Completion of closure	2018
5.	Completion of post-closure period	2048

2.6 Estimated Year of Closure Completion- § 257.102(b)(1)(vi)

The estimated year for completion of Stilling Pond 2C closure activities is 2018.

The Sluice Channel closure was completed in 2017.

2.7 Request for Time Extension

If estimated that the time required to complete closure will exceed the regulatory timeframes, site-specific information, factors and considerations will be provided to support any time extensions.

Performance Standards: CCR Closure In-Place - 40 CFR § 257.102(d)(1)

40 CFR § 257.102(d)(1). Closure performance standard when leaving CCR in place –

- (1) *The owner or operator of a CCR unit must ensure that, at a minimum, the CCR unit is closed in a manner that will:*
 - (i) *Control, minimize or eliminate, to the maximum extent feasible, post-closure infiltration of liquids into the waste and releases of CCR, leachate, or contaminated run-off to the ground or surface waters or to the atmosphere;*
 - (ii) *Preclude the probability of future impoundment of water, sediment, or slurry;*
 - (iii) *Include measures that provide for major slope stability to prevent the sloughing or movement of the final cover system during the closure and post-closure care period;*
 - (iv) *Minimize the need for further maintenance of the CCR unit; and*
 - (v) *Be completed in the shortest amount of time consistent with recognized and generally accepted good engineering practices.*



2.7.1 Control of Infiltration and Releases - § 257.102(d)(1)(i)

TVA will control, minimize or eliminate, to the maximum extent feasible, post-closure infiltration of liquids into the waste and releases of CCR, leachate, or contaminated run-off to the ground or surface waters or to the atmosphere, through the following measures:

- 1) Installation of a final cover system that minimizes infiltration. Design specifications of the final cover system are described in **Section 2.9.1 and 2.9.2**.
- 2) Using appropriate erosion and sediment control.
- 3) Surface treatment described in **Section 2.8.2**.
- 4) The implementation and maintenance of the groundwater monitoring network described in **Section 3.1.3**.

2.7.2 Prevention of Future Impoundment of Water, Sediment, or Slurry – § 257.102(d)(1)(ii)

PWB1 will be constructed over the footprint of Stilling Pond 2C. Stilling Pond 2C will be closed by removal of CCR within the impoundment, down to 1 foot below the original subgrade. PWB1 will be constructed over the closed area, and will incorporate a subsurface drainage layer, a liner system that includes an impermeable geomembrane and geocomposite clay liner, and a protective stone cover. PWB1 will manage only non-CCR process water and storm water.

2.7.3 Slope Stability Measures - §257.102(d)(1)(iii)

TVA will include measures that reduce risk of sloughing or movement of the final cover system during the closure and post-closure period, including:

- 1) The impoundment will be decanted sufficiently to remove free liquids.
- 2) Moisture conditioning and/or compaction of the subgrade to provide a stable and competent base for the construction of the final cover system will be performed prior to final cover installation.
- 3) PWB1 will be designed and graded to prevent sloughing or movement of the final cover system during closure and post-closure period by the selection of cover materials with adequate internal and interface shear strength to provide cover system stability safety factors.

2.7.4 CCR Unit Maintenance - §257.102(d)(1)(iv)

TVA will design and construct the final system to minimize the need for further maintenance of the CCR unit.

The final cover system will be vegetated or covered with rip rap to minimize erosion and future maintenance requirements. The existing spillway within Stilling Pond 2C, which consists of 3 risers and outlet pipes, will be lined to address infiltration. A cured-in-place pipe (CIPP) liner



system is proposed for the discharge pipes. The vertical concrete riser sections will remain in place and will be patched as necessary and sealed. The concrete weir and rock-lined channel from the Main Ash Pond to PWB1 will be replaced. The new concrete weir will be a cast-in-place concrete overflow structure with stoplogs, set on a spread footing within the splitter dike.

2.7.5 Completion of Closure - §257.102(d)(1)(v)

Stilling Pond 2C closure will be completed in the shortest amount of time practical, consistent with recognized and generally accepted good engineering practices.

The Sluice Channel was closed in 2017.

2.8 Drainage and Stabilization of Surface Impoundments - §257.102(d)(2)

40 CFR § 257.102(d)(2). *Drainage and stabilization of CCR surface impoundments.*

The owner or operator of a CCR surface impoundment or any lateral expansion of a CCR surface impoundment must meet the requirements of paragraphs (d)(2)(i) and (ii) of this section prior to installing the final cover system required under paragraph (d)(3) of this section.

- (i) Free liquids must be eliminated by removing liquid wastes or solidifying the remaining wastes and waste residues.*
- (ii) Remaining wastes must be stabilized sufficient to support the final cover system.*

Prior to installation of a final cover system to a CCR surface impoundment:

- Free liquids will be eliminated by removing liquid wastes or solidifying the remaining wastes and waste residues; and
- Remaining wastes will be stabilized sufficient to support the final cover system.

2.9 Final Cover System Design (or Alternative) - § 257.102(d)(3)

40 CFR § 257.102(d)(3). *Final cover system. If a CCR unit is closed by leaving CCR in place, the owner or operator must install a final cover system that is designed to minimize infiltration and erosion, and at a minimum, meets the requirements of paragraph (d)(3)(i) of this section, or the requirements of the alternative final cover system specified in paragraph (d)(3)(ii) of this section.*

- (i) The final cover system must be designed and constructed to meet the criteria in paragraphs (d)(3)(i)(A) through (D) of this section. The design of the final cover system must be included in the written closure plan required by paragraph (b) of this section.*

(A) The permeability of the final cover system must be less than or equal to the permeability of any bottom liner system or natural subsoils present, or a permeability no greater than 1×10^{-5} cm/sec, whichever is less.

- (B) *The infiltration of liquids through the closed CCR unit must be minimized by the use of an infiltration layer that contains a minimum of 18 inches of earthen material.*
- (C) *The erosion of the final cover system must be minimized by the use of an erosion layer that contains a minimum of six inches of earthen material that is capable of sustaining native plant growth.*
- (D) *The disruption of the integrity of the final cover system must be minimized through a design that accommodates settling and subsidence.*
- (ii) *The owner or operator may select an alternative final cover system design, provided the alternative final cover system is designed and constructed to meet the criteria in paragraphs (d)(3)(ii)(A) through (C) of this section. The design of the final cover system must be included in the written closure plan required by paragraph (b) of this section.*
- (A) *The design of the final cover system must include an infiltration layer that provides an equivalent reduction in infiltration as the infiltration layer specified in paragraphs (d)(3)(i)(A) and (B) of this section.*
- (B) *The design of the final cover system must include an erosion layer that provides equivalent protection from wind or water erosion as the erosion layer specified in paragraph (d)(3)(i)(C) of this section..*
- (C) *The disruption of the integrity of the final cover system must be minimized through a design that accommodates settling and subsidence.*

2.9.1 Final Cover System Design Standards - § 257.102(d)(3)(i)

A final cover system consisting of a geomembrane liner system and a vegetative cover were utilized for the closure of the Sluice Channel.

An alternative final cover system is proposed for the closure of Stilling Pond 2C. Additional information on the alternative final cover system is included in section 2.9.2.

2.9.2 Alternative Final Cover System Design - § 257.102(d)(3)(ii)

A final cover system consisting of a geomembrane liner system and a vegetative cover were utilized for the closure of the Sluice Channel.

An alternative final cover system has been proposed to minimize infiltration and erosion within Stilling Pond 2C, the final cover system consists of the following elements:

- No. 57 stone drainage layer
- Geosynthetics: A 60-mil linear low density polyethylene (LLDPE) geomembrane will serve as the infiltration layer. The permeability of this geomembrane is significantly less than 1×10^{-5} cm/s. A geotextile may be employed below the drainage layer and above the

geomembrane to minimize constructability concerns. A geosynthetic clay liner will be placed above the drainage layer;

- Protective cover: A variable depth of No. 2 protective stone will be placed above the geosynthetics to act as a protective cover.

Figure 1 provides an illustration of the Alternative 1 Final Cover.

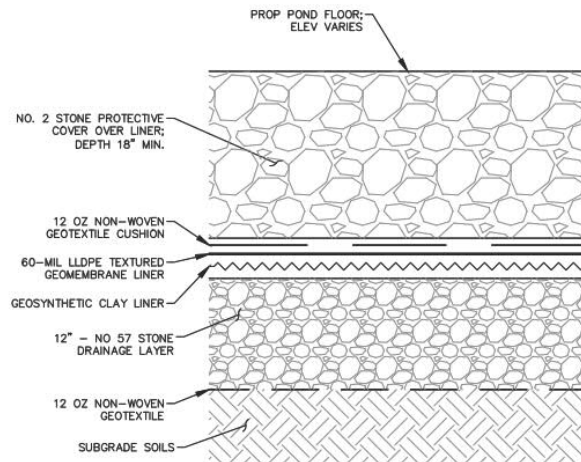


Figure 1: Alternative 1 Final Cover

The proposed final cover system is recommended for placement within the PWB1, as the impoundment will be constructed to treat Plant process water and storm water. A vegetative cover system is not feasible for this option.

2.9.3 Methods and Procedures for Installation of Final Cover - § 257.102(b)(1)(iii)

As required by 40 CFR 257.102(b)(1)(iii), the following methods and procedures will be used in the installation of the final cover.

After the completion of decanting, drying, and stabilization if necessary, the existing subgrade will be graded and compacted to provide a stable and competent base for the final cover system in the impoundment. CCR material within the design grades of the impoundment will be removed down to one foot below the original subgrade of Stilling Pond 2C.

Upon reaching design subgrades, the final cover system will be installed. The final grades can be found in **Exhibit 1** located in **Appendix A**.

2.9.4 Professional Engineer Certification - § 257.102(d)(3)(iii)

40 CFR 257.102(d)(3)(iii). *The owner or operator of the CCR unit must obtain a written certification from a qualified professional engineer that the design of the final cover system meets the requirements of this section.*

A professional engineer will provide a written certification stating that the design of the final cover system meets the requirements of 40 CFR 257.102. The certification will be included in the facility's notification of intent to close Stilling Pond 2C, as per 40 CFR 257.102(g).

3.0 Written Post-Closure Plan - 40 CFR § 257.104(d)(1)

40 CFR § 257.104(d)(1). *Written Post-Closure Care Plan. (1) Content of the plan. The owner or operator of a CCR unit must prepare a written post-closure plan that includes at a minimum, the information specified in paragraph (d)(1)(i) through (iii) of this section.*

- (i) *A description of the monitoring and maintenance activities required in paragraph (b) of this section for the CCR unit, and the frequency at which these activities will be performed;*
- (ii) *The name, address, telephone number, and email address of the person or office to contact about the facility during the post-closure care period;*
- (iii) *A description of the planned uses of the property during the post-closure period. Post-closure use of the property shall not disturb the integrity of the final cover, liner(s), or any other component of the containment system, or the function of the monitoring system unless necessary to comply with the requirements in this subpart. Any other disturbance is allowed if the owner or operator of the CCR unit demonstrates that disturbance of the final cover, liner, or other component of the containment system, including any removal of CCR, will not increase the potential threat to human health or the environment. The demonstration must be certified by a qualified professional engineer, and notification shall be provided to the State Director that the demonstration has been placed in the operating record and on the owner's or operator's publicly accessible internet site.*

3.1 Monitoring and Maintenance Activities - § 257.104(d)(1)(i)

40 CFR § 257.104(b). *Post-closure care maintenance requirements. Following closure of the CCR unit, the owner or operator must conduct post-closure care for the CCR unit, which must consist of at least the following:*

- (1) *Maintaining the integrity and effectiveness of the final cover system, including making repairs to the final cover as necessary to correct the effects of settlement, subsidence, erosion, or other events, and preventing run-on and run-off from eroding or otherwise damaging the final cover;*



- (2) *If the CCR unit is subject to the design criteria under § 257.70, maintaining the integrity and effectiveness of the leachate collection and removal system and operating the leachate collection and removal system in accordance with the requirements of § 257.70; and*
- (3) *Maintaining the groundwater monitoring system and monitoring the groundwater in accordance with the requirements of § 257.90 through § 257.98.*

In accordance with 40 CFR § 257.104(d)(1)(i), post-closure care for the closed Stilling Pond 2C will address the following systems as required under 40 CFR § 257.104(b), along with the frequencies for the identified monitoring and maintenance activities:

- Final cover system;
- Underdrain water collection and removal system; and
- Groundwater monitoring system.

3.1.1 Final Cover System - § 257.104(b)(1)

TVA will maintain the integrity and effectiveness of the final cover system, and make repairs as necessary to correct the effects of settlement, subsidence, erosion, and other events, and prevent run-on and run-off from eroding or otherwise damaging the final cover. The final cover will be maintained by inspection and corrective measures.

3.1.2 Leachate Collection and Removal System - § 257.104(b)(2)

No leachate collection and removal system is associated with the closure of Stilling Pond 2C and/or the construction of PWB1. An underdrain water collection system will be installed within PWB1 to keep the subgrade immediately below the liner system dry during the liner installation.

3.1.3 Groundwater Monitoring System - § 257.104(b)(3).

The groundwater monitoring system will be designed and maintained in accordance with the CCR Rule, 40 CFR § 257.90 through 98.

All monitoring devices, including groundwater wells, will be maintained throughout the active life and post-closure period of PWB1.

3.1.4 Instrumentation Monitoring Plan

TVA BRF currently utilizes an Instrumentation Monitoring Plan (IMP). AECOM has revised the IMP to account for current and future instrumentation that will be installed during the closure activities throughout the site. The IMP requires all permanent instruments to be automated following construction of the final cover system, though the instruments may be installed prior to



the completion of the final cover construction. The IMP will be utilized through the closure and post-closure period. Instruments will be monitored and evaluated at frequencies dictated by the IMP.

3.2 Contact Information - § 257.104(d)(1)(ii)

The following contact information is provided for the Bull Run Fossil Plant for the post-closure period:

Owner: Tennessee Valley Authority, as agent for the United States of America
Contact: Civil Projects & CCP Management, Strategy and Engineering
1101 Market Street
Chattanooga, TN 37402-2801
Phone: 844-342-0012
Email: tvainfo@tva.com



3.3 Planned Uses - § 257.104(d)(1)(iii)

The planned use of Stilling Pond 2C during the post-closure period is a process water basin, known as PWB1.

Post-closure use of the property will not disturb the integrity of the final cover, liner(s), or any other component of the containment system, or the function of the monitoring systems, unless necessary to comply with the requirements of the CCR Rule under 40 CFR Part § 257.

Any other disturbance is allowed if the owner or operator of the CCR unit demonstrates that disturbance of the final cover, liner, or other component of the containment system, including any removal of CCR, will not increase the potential threat to human health or the environment. The demonstration must be certified by a qualified professional engineer, and notification shall be provided to the State Director that the demonstration has been placed in the operating record and on the owner's or operator's publicly accessible internet site.

APPENDIX A

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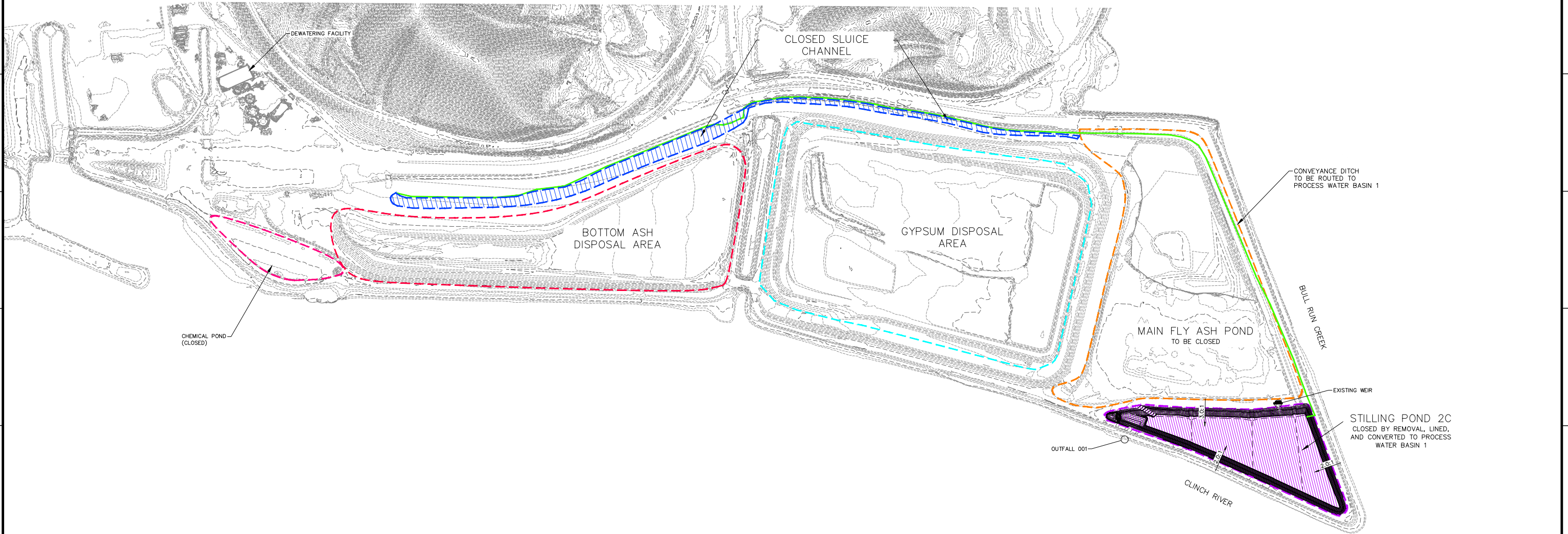
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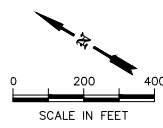
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- LEGEND**
- CONVEYANCE DITCH
 - CHEMICAL POND
 - - - BOTTOM ASH AREA
 - - - SLUICE CHANNEL
 - - - GYPSUM STACK
 - - - STILLING POND 2C
 - - - MAIN ASH POND
 - - - EXISTING CONTOUR MAJOR
 - - - EXISTING CONTOUR MINOR
 - - - EXISTING WATER LINE
 - EXISTING ACCESS ROAD
 - STILLING POND CLOSURE AREA
 - SLUICE CHANNEL CLOSURE AREA



FOR SUPPORTING DESIGN CALCULATIONS SEE		R 0	7/7/2017	JMB	-	-	-	-	612403	DISCIPLINE
REV. NO.	DATE	DSN	DRN	CHKD	SUPLY	RWED	APFD	ISSD	PROJECT ID	AS CONST
SCALE: 1" = 200'										
EXCEPT AS NOTED										
STAGE 2 - CLOSURE PLAN										
BULL RUN STILLING POND CLOSURE PLAN										
BULL RUN FOSSIL PLANT										
CLOSURE SCHEMATIC										
DESIGNED BY: AMC	DRAWN BY: AMC	CHECKED BY: SCW	SUPERVISED BY: XXX	REVIEWED BY: XXX	APPROVED BY: XXX	ISSUED BY: XXX				
BULL RUN FOSSIL PLANT TENNESSEE VALLEY AUTHORITY FOSSIL AND HYDRO ENGINEERING										
AUTOCAD	2016	7/7/2017	49	C	FIGURE 5	R				

DRAFT

ISSUED FOR APPROVAL
NOT FOR CONSTRUCTION

AECOM