



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

April 12, 2018  
File: rpt\_034\_let\_175565009  
Revision 0

Tennessee Valley Authority  
1101 Market Street  
Chattanooga, Tennessee 37402

**Re: Initial Hazard Potential Classification Assessment  
Main Ash Pond  
EPA Final Coal Combustion Residuals (CCR) Rule  
TVA Bull Run Fossil Plant  
Clinton, Tennessee**

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## **1.0 PURPOSE**

This letter documents Stantec Consulting Services Inc.'s (Stantec) certification of the initial hazard potential classification assessment for the TVA Bull Run Fossil Plant's Main Ash Pond. The EPA Final CCR Rule requires owners or operators of 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 Main Ash Pond has been assigned a significant hazard potential classification rating.

## **2.0 BASIS FOR CLASSIFICATION RATING**

As described in the attached assessment report, the hazard potential classification rating of "significant" was assigned to the Main Ash Pond because a failure or mis-operation would result in no probable loss of human life, but could cause economic loss, environmental damage, disruption of lifeline facilities, or impact other concerns. In 2013, Stantec reviewed the hazard potential classification of Main Ash Pond. It was determined that a breach of the impoundment would not likely result in loss of life. However, a breach would likely result in the release of CCR materials to Bullrun Creek or the Clinch River. Review of the analysis and current conditions at the Main Ash Pond concluded that the existing hazard classification was applicable.

## **3.0 SUMMARY OF FINDINGS**

The attached report presents the analysis for the initial hazard potential classification assessment. The results demonstrate that the impoundment meets the hazard potential classification of "significant."



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EPA Final Coal Combustion Residuals (CCR) Rule  
TVA Bull Run Fossil Plant  
Clinton, Tennessee**

#### **4.0 QUALIFIED PROFESSIONAL ENGINEER CERTIFICATION**

I, John S. Montgomery, 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; and
3. that the initial hazard potential classification assessment for the TVA Bull Run Fossil Plant's Main Ash Pond meets the requirements specified in 40 CFR 257.73(a)(2).

SIGNATURE

  
\_\_\_\_\_

DATE



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**

Bull Run Fossil Plant  
Main Ash Pond  
Clinton, Tennessee



Prepared for:  
Tennessee Valley Authority  
Chattanooga, Tennessee

Prepared by:  
Stantec Consulting Services Inc.  
Lexington, Kentucky

April 12, 2018

Revision 0

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## INITIAL HAZARD POTENTIAL CLASSIFICATION ASSESSMENT

Rating  
April 12, 2018

### 1.0 RATING

The Main Ash Pond at the Bull Run Fossil Plant (BRF) is regulated under 40 CFR § 257 Subpart D as an inactive surface impoundment. 40 CFR § 257.100(e)(3)(v) of the EPA Final Coal Combustion Residuals (CCR) Rule requires that a hazard potential classification assessment be prepared and placed in the facility's operating record by April 17, 2018.

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 40 CFR § 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 Main Ash Pond is classified as a significant hazard potential CCR surface impoundment.

This report contains supporting documentation for the hazard potential classification assessment. The hazard potential classification for this structure was determined by a review of available data.

## **INITIAL HAZARD POTENTIAL CLASSIFICATION ASSESSMENT**

Basis of Rating  
April 12, 2018

### **2.0 BASIS OF RATING**

#### **2.1 INTRODUCTION**

The Tennessee Valley Authority (TVA) has contracted Stantec Consulting Services Inc. (Stantec) to review and update previous hazard potential classification assessments as needed for selected impoundments at various TVA Plants.

BRF is located in Anderson County, Tennessee at the confluence of Bullrun Creek and the Clinch River, approximately 15 miles west of Knoxville, Tennessee. The Main Ash Pond is located to the south of the plant. A figure of the Main Ash Pond is provided in the appendix. Active ash sluicing operations into the pond ceased in November 2010. A Notification of Intent to Initiate Closure was placed in the facility's operating record on December 15, 2015. As of the date of this report, the Main Ash Pond continues to impound water.

#### **2.2 SOURCE DATA**

For the BRF Main Ash Pond, an assessment was previously conducted in 2013. Based on the findings of that study, it was recommended that the hazard classification be listed as a significant hazard.

#### **2.3 POTENTIAL FAILURE SCENARIOS**

As part of the 2013 study, a breach on the south side of the Main Ash Pond was modeled. Model results indicated that no structures or roads would be impacted; therefore, probable loss of human life due to a breach was not envisioned. It was noted in the 2013 assessment that a breach would likely result in the off-site release of CCRs into the waters of the United States.

As part of this 2018 initial hazard classification assessment, site conditions were reviewed to determine if changes have occurred to the impoundment or to downstream areas that would affect the conclusions of the 2013 study. No significant changes were observed and it is concluded that the hazard classification determination is appropriate.

#### **2.4 HAZARD CLASSIFICATION**

Findings of this review and assessment show that a breach of the Main Ash Pond would result in no probable loss of life, but could cause economic loss or environmental damage. It is Stantec's opinion the impoundment fits the definition for a significant hazard potential CCR surface impoundment as defined in the EPA Final CCR Rule §257.53.

## INITIAL HAZARD POTENTIAL CLASSIFICATION ASSESSMENT

References  
April 12, 2018

### 3.0 REFERENCES

1. Hazardous and Solid Waste Management System; Disposal of Coal Combustion Residuals from Electric Utilities; Final Rule. 80 FR 21301, April 17, 2015.
2. Hazardous and Solid Waste Management System; Disposal of Coal Combustion Residuals from Electric Utilities; Extension of Compliance Deadlines for Certain Inactive Surface Impoundments; Response to Partial Vacatur. 81 FR 51802, August 5, 2016.
3. Stantec Consulting Services Inc., September 30, 2013. Dam Safety Hazard Classification Projects Summary Report.

**APPENDIX  
SITE OVERVIEW FIGURE**



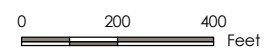
Figure No.  
**1**  
 Title  
**Site Overview -  
 BRF - Main Ash Pond**

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Client/Project  
 Tennessee Valley Authority  
 Bull Run Fossil Plant (BRF)  
 Hazard Potential Classification Assessment

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Project Location: Clinton, TN  
 Prepared by mmm on 2018-04-12  
 Technical Review by awg on 2018-04-12  
 Independent Review by wrm on 2018-04-12  
 175565009



**Fly Ash Stilling Pond 2C**

**Main Ash Pond**

**Approximate CCR Unit Limits**

**Clinch River**

**Bullrun Creek**

**Notes**  
 1. Coordinate System: NAD 1983 StatePlane Tennessee FIPS 4100 Feet  
 2. TVA Aerial Imagery dated 2017.



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 Revised: 2018-04-09 By: mmeehon