Stantec Consulting Services Inc.
1409 North Forbes Road, Lexington KY 40511-2024

October 12, 2016
File: rpt_001_let_175555021
Revision 0

Tennessee Valley Authority
1101 Market Street
Chattanooga, Tennessee 37402

RE: Closure and Post-Closure Plan
Dry Ash Stack and Gypsum Storage Area
EPA Final Coal Combustion Residuals (CCR) Rule
TVA Cumberland Fossil Plant
Cumberland City, Tennessee

1.0 PURPOSE

This letter documents Stantec's certification of the EPA Final CCR Rule closure and post-closure plan for the TVA Cumberland Fossil Plant's Dry Ash Stack and Gypsum Storage Area.

2.0 CLOSURE AND POST-CLOSURE PLAN

The closure plan describes the steps necessary to close the CCR units at any time during the life of the unit, 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 the unit, and is subject to the requirements of 40 CFR 257.104(d).

The EPA Final CCR Rule closure and post-closure plan is conceptual and subject to change at any time. The attached closure and post-closure plan demonstrates compliance with the requirements set forth in 40 CFR 257.102(b) and 257.104(d).

3.0 QUALIFIED PROFESSIONAL ENGINEER CERTIFICATION

I, Stephen H. Bickel, 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;

RE: Closure and Post-Closure Plan
Dry Ash Stack and Gypsum Storage Area
EPA Final Coal Combustion Residuals (CCR) Rule
TVA Cumberland Fossil Plant
Cumberland City, Tennessee

3. that the closure plan for the TVA Cumberland Fossil Plant's Dry Ash Stack and Gypsum Storage Area meets the requirements described in 40 CFR 257.102(b); and

4. that the post-closure plan for the TVA Cumberland Fossil Plant's Dry Ash Stack and Gypsum Storage Area meets the requirements of 40 CFR 257.104(d).

SIGNATURE _____ DATE 10/12/2016

ADDRESS: Stantec Consulting Services Inc.
10509 Timberwood Circle, Suite 100
Louisville, Kentucky 40223-5301

TELEPHONE: (502) 212-5000

ATTACHMENT: Closure and Post-Closure Plan

Closure and Post-Closure Plan

Cumberland Fossil Plant
Dry Ash Stack and Gypsum
Storage Area
Stewart County, Tennessee

Prepared for:
Tennessee Valley Authority
Chattanooga, Tennessee

Prepared by:
Stantec Consulting Services Inc.
Louisville, Kentucky

October 12, 2016
Revision 0

Table of Contents

October 12, 2016

1.0 INTRODUCTION

This Coal Combustion Residuals (CCR) Rule closure and post-closure plan is conceptual and is subject to revision. It describes the CCR closure and post-closure activities at the TVA Cumberland Fossil Plant to ensure that the Dry Ash Stack and Gypsum Storage Area will be closed and maintained in accordance with the CCR closure and post-closure requirements of 40 CFR §§257.102 and 104, respectively. TVA has determined that the Dry Ash Stack and Gypsum Storage Areas are existing CCR landfills and therefore subject to the EPA Final CCR Rule. By being located adjacent to each other, the CCR Units have facilitated the design of a joint and simultaneous closure, and are therefore included in this combined closure and post-closure plan. The landfills are operating under Tennessee Department of Environment and Conservation (TDEC) Class II Landfill Permit No. IDL 81-102-0086. Necessary State approvals will be obtained prior to initiating closure of the Dry Ash Stack and Gypsum Storage Area.

2.0 WRITTEN CLOSURE PLAN

40 CFR 257.102(b). *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 CRR 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 estimated timeframes to complete each step or phase of CCR unit closure. When preparing the written closure plan, if the owner or operator of a CCR unit estimates that the time required to complete closure will exceed the timeframes specified in paragraph (f)(1) of this section, the written closure plan must include the site-specific information, factors and considerations that would support any time extensions sought under paragraph (f)(2) of this section.

2.1 CLOSURE ACTIVITIES

Based on conceptual plans, the Dry Ash Stack and Gypsum Storage Area will be closed in place. Prior to closure of the units, the sequential steps to be taken will include coordinating with and obtaining necessary approvals and permits from other agencies, grading of the units, and installation of the final cover system. Following partial and final closure, drainage improvements will be made.

2.2 CLOSURE TYPE

2.2.1 Closure in place

Conceptually, the CCR in the Dry Ash Stack and Gypsum Storage Area will be left in place to receive a final cap cover. The design of a final cover system and related closure elements will meet the CCR closure in-place performance standards described in Section 3.0.

2.2.2 Closure by removal

40 CFR 257.102(c). *Closure by removal of CCR. An owner or operator may elect to close a CCR unit by removing and decontaminating all areas affected by releases from the CCR unit. CCR removal and decontamination of the CCR unit are complete when constituent concentrations throughout the CCR unit and any areas affected by releases from the CCR unit have been removed and groundwater monitoring concentrations do not exceed the groundwater protection standard established pursuant to §257.95(h) for constituents listed in appendix IV to this part.*

The conceptual process of closure allows for the possibility of closure by removal at the Dry Ash Stack and Gypsum Storage Area in line with the aforementioned CCR closure-by-removal standards.

2.3 MAXIMUM CCR INVENTORY

Based on available records, it is assumed that the maximum inventory of material on-site is consistent with the current volumes, which are approximately 5 million cubic yards in the Dry Ash Stack and 4 million cubic yards in the Gypsum Disposal Complex.

2.4 LARGEST AREA REQUIRING FINAL COVER

Based on available records, the estimated largest area of the Dry Ash Stack and Gypsum Storage Area requiring a final cover during the active life of the CCR unit is consistent with the current disposal area and is approximately 115 acres and 155 acres, respectively.

2.5 SCHEDULE OF CLOSURE ACTIVITIES

The following closure schedule for completing the activities stipulated by 40 CFR 257.102 and the related completion timeframes are subject to change based on plant operations, regulatory permitting approvals, EPA Final CCR Rule standards, marketing, and other factors. Table 1 provides the estimated schedule of closure activities.

Table 1. Estimated Schedule of Closure Activities

	Closure Activity	Start Date (day)
1.	Coordinating with and obtaining necessary approvals and permits from regulatory agencies; provide notice of intent to close.	1
2.	Close landfill, and achieve final grade	61
3.	Installation of final cover	151
4.	Establish vegetative cover	421
5.	Completion of post-closure care period	30 years after final cover installed

2.6 ESTIMATED YEAR OF CLOSURE COMPLETION

The estimated year for completion of closure activities is 2024 for the Dry Ash Stack and 2042 for the Gypsum Disposal Complex. The estimated year of closure is subject to change based on plant operations, regulatory permitting approvals, EPA Final CCR Rule standards, marketing, and other factors.

2.7 REQUEST FOR TIME EXTENSION

The EPA Final CCR Rule allows six months to complete the closure of a landfill or lateral expansion of a landfill upon commencing closure activities. However, if it is 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.

3.0 CCR CLOSURE IN-PLACE PERFORMANCE STANDARDS

40 CFR 257.102(d). *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.

3.1.1 Control of Infiltration and Releases

TVA will control post-closure infiltration into the waste and releases of CCR, leachate, or contaminated run-off to the ground or surface waters or to the atmosphere, through the design of a site grading plan, construction of an engineered cap system, and the establishment of a stormwater management system in accordance with accepted engineering practices. The cap system will be designed to limit the infiltration of precipitation into the unit according to acceptable, permeability compliance limits. The cap system will also act to cover, control, and prevent the release of CCR material from the unit, into surface waters and the atmosphere. The designed grading plan and stormwater management system will promote positive drainage and limits infiltration into the CCR material. The cap cover is designed to limit the exposure of CCR material to the atmosphere.

After comparing the soil cap and geomembrane cap systems, the geomembrane cap system is expected to be easier to construct and will result in a shortened construction schedule. The geomembrane cap system is also expected to provide a better and more consistent moisture barrier. In addition, low permeability clay is not readily available in the vicinity of the plant. As a result, a geomembrane cap system is proposed.

The final cover system will consist of the following materials and thicknesses, as listed in order of construction (bottom to top):

- 40-mil Textured LLDPE Flexible Geomembrane
- Geocomposite Drainage Layer
- 18-inches Protective Cover Soil
- 6-inches Vegetative Cover Soil

The ash and gypsum materials are placed and compacted within each facility in a manner to minimize settling and subsidence that could disrupt the integrity of the final cover system.

Geosynthetic Materials

The geomembrane will cover the facilities and extend to the delineated waste boundary. The geomembrane will be placed directly on a cushion geotextile fabric for protection during the initial partial closure because it will be placed over interim cover soil. The geomembrane will be placed directly on CCR materials for the remainder of the facility closure. The geocomposite drainage layer will be placed above the geomembrane and drain surface water that infiltrates through the overlying soil materials. The geosynthetic materials will be installed and tested as required by the manufacturer.

Protective Cover Soil

An 18-inch layer of protective cover soil will be placed overtop the geocomposite drainage layer within the final cover system.

Vegetative Cover

As described above, a 6-inch vegetative cover will be established over the 18-inch protective cover soil layer. The conditioning, fertilizing, and seeding or sodding will begin immediately upon placement of the final cover. No nuisance or invasive species will be used as vegetative cover.

3.1.2 Prevention of Future Impoundment of Water, Sediment, or Slurry

TVA will control the future impoundment of water or sediment at the Dry Ash Stack and Gypsum Storage Area through the design and construction of a site grading plan and an engineered cap system, and the establishment of a stormwater management system in accordance with accepted engineering practices. The designed grading plan and stormwater management system will promote positive surface drainage on the site.

Dry Ash Stack

The surface runoff around the closed north, south and east sides of the Dry Ash Stack will be directed to the Ash Pond located north of the facility. A riprap flume on the north slope of the stack will convey runoff from the benches and top of the stack to the drainage ditch located along the toe of the facility. A drainage ditch along the toe of the south stack slope will convey flow to the base of the flume where pipes convey flow to the Ash Pond for discharge to the Cumberland River through a regulated NPDES outfall.

The runoff in the perimeter ditch along the west and south side of the facility will be directed to Wells Creek through stormwater outfalls constructed during the partial closure. This perimeter ditch will be modified with the goal of promoting positive drainage of "non-contact" runoff away from the waste stack, minimizing impounded water, and improving maintenance conditions. These ditch improvements also allow the runoff collected by the proposed geocomposite layer of the cap system to be effectively discharged. The ditch improvements will be performed along the west perimeter ditch of the Dry Ash Stack once the slopes are closed. The ditch will be regraded to achieve a one to two-percent ditch slope to intermediate outlets to direct storm water runoff directly to Wells Creek. Construction sequencing and continued operation will be such that the ditch does not collect drainage from areas with exposed waste and only "non-contact" runoff will be directed through the new outlets to Wells Creek.

To prevent "contact" water from flowing down the closed slopes from the active stacking areas, soil berms will be constructed and maintained at the crest of the stack slopes until closure of the facilities is complete. Stacking will be performed to direct "contact" runoff for the active portions of the Dry Ash Stack to the riprap-lined flume on the north side of the stack and then to the Ash Pond until final closure.

Gypsum Disposal Complex

The surface runoff from the closed north and west sides of the Gypsum Disposal Complex will be directed to the Ash Pond located to the northwest of the facility. A riprap flume on the northwest slope of the complex will convey runoff from the benches and top of the stack to the Bottom Ash Pond. Runoff from the west slope will be directed to the Ash Pond in the same drainage ditch as the south slope of the Dry Ash Stack. From the Bottom Ash Pond and drainage ditch, stormwater flow is conveyed through a series of drainage ditches to the Ash Pond for discharge to the Cumberland River through a regulated NPDES outfall.

The surface runoff within the perimeter ditch along the south and east sides of the facility will be directed to Wells Creek through stormwater outfalls constructed during the partial closure. For both facilities, surface water that infiltrates through the soil materials and is captured in the geocomposite material will be drained through a series of geocomposite collection drains. These collection drains consist of crushed stone and geotextile fabric that outlet within the perimeter ditches.

Erosion prevention and sediment control measures will be put in place at each outfall until such time that vegetation is established upstream.

3.1.3 Slope Stability Measures

TVA will include measures that provide for acceptable veneer slope stability factors of safety against the sloughing or movement of the final cover system during the closure and post-closure period in accordance with accepted engineering practices. Maintenance of vegetative cover during the construction and post-construction periods will further aid in the prevention of erosion and sloughing.

3.1.4 CCR Unit Maintenance

TVA will mitigate against the need for further maintenance of the CCR unit through compliance with post-closure care activities. Regularly scheduled inspections to evaluate post-closure conditions and to verify preventive maintenance activities of the unit will reduce the need for additional maintenance. Post-closure monitoring and maintenance activities are addressed in Section 4.0.

3.1.5 Completion of Closure

Closure will be completed in a timeframe consistent with recognized and generally accepted good engineering practices. A qualified professional engineer will verify that the final cover system is constructed in accordance with the EPA Final CCR Rule.

3.2 DRAINAGE AND STABILIZATION OF SURFACE IMPOUNDMENTS

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.

Since the units are not surface impoundments, they are not subject to the requirements of 40 CFR 257.102(d)(2). Therefore, this section is not applicable.

3.3 FINAL COVER SYSTEM DESIGN (OR ALTERNATIVE)

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 (f)(3)(ii)(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 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.

3.3.1 Final Cover System Design Standards

TVA proposes to install an alternative final cover system as described in Section 3.3.2.

3.3.2 Alternative Final Cover System Design

An alternative final cover system design may be selected provided it achieves an equivalent standard to Section 3.3. for the following:

- An infiltration layer that achieves an equivalent reduction in infiltration as the infiltration layer specified in Section 3.3.
- An erosion layer that provides equivalent protection from wind or water erosion as the erosion layer specified in Section 3.3.
- The minimization of disruptions of the integrity of the final cover system through a design that accommodates settling and subsidence.

The current proposed cap design involves the installation of a geocomposite infiltration layer that meets the definition of an alternative final cover system under the EPA Final CCR Rule. This proposed layer achieves an equivalent reduction in infiltration as the infiltration layer specified in Section 3.3, by having a permeability values ranging from 10^{-13} to 10^{-14} cm/sec. A 6-inch layer of vegetative cover meeting the requirements of Section 3.3 is included within the alternative final cover system. The CCR materials will be placed and compacted in a manner to minimize settling and subsidence that could disrupt the integrity of the final cover system.

3.3.3 Methods and Procedures for Installation of Final Cover

40 CFR 257.102(b)(1)(iii) requires a description of the methods and procedures used in the installation of the final cover. Section 3.1.1 describes the details regarding the construction procedures for cover installation.

3.3.4 Professional Engineer Certification

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 the Dry Ash Stack and Gypsum Storage Area, as per 40 CFR 257.102(g).

4.0 WRITTEN POST-CLOSURE PLAN

40 CFR 257.104(d). *Written Post-Closure 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 paragraphs (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; and

(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 systems 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.

4.1 MONITORING AND MAINTENANCE ACTIVITIES

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 Dry Ash Stack and Gypsum Storage Area 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;
- Groundwater monitoring system.

4.1.1 Final Cover System

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 control run-on and run-off from eroding or otherwise damaging the final cover, in accordance with accepted engineering practices. Regularly scheduled inspections, developed specifically for the conditions at the Cumberland Fossil Plant, will be conducted on the final cover system, and will include visual observations of the dike slopes, crest, and toe. Inspections will monitor for erosion, pooling, sloughing, burrows, excessive plant growth, wet areas, seeps, bare areas, and other visual structural issues.

Repairs will be conducted as deemed necessary to correct the effects of settlement, subsidence, erosion, and other surface defects encountered during visual inspections, and to prevent run-on and run-off from eroding or otherwise damaging the final cover. Repairs may consist of grading activities to correct erosion and poor surface runoff conditions, and pest management to control burrowing into dikes.

Regular maintenance events will include preserving the health of the vegetative cover, and mowing activities, to be conducted as needed.

During the post-closure care period, the following activities will be performed on the closed portions of the facilities:

- Maintain the approved final contours and drainage systems of the site such that erosion of the cover system is minimized, precipitation on the closed areas is controlled and directed off the closure area, and poor surface runoff is eliminated.

- Maintain a healthy vegetative cover on the site for sediment and erosion control.
- Eradicate nesting non-migratory pests as needed.
- Maintain and monitor the surface water drainage features until such time as permanent cover has been established. Maintenance of the surface water drainage system will continue throughout the post-closure period to prevent erosion and remove sediment accumulation to promote positive drainage and acceptable performance of the drainage system.

If issues or problems are observed, corrective measures will be implemented to correct the problem as needed, and inspection records will be maintained at the site.

4.1.2 Leachate Collection and Removal System

Since the units are not new CCR landfills or lateral expansions of CCR landfills, they are not subject to the requirements of 40 CFR 257.70. Therefore, this section is not applicable.

4.1.3 Groundwater Monitoring System

The groundwater monitoring system will be designed and maintained in accordance with the EPA Final CCR Rule, 40 CFR §257.90 through 98. Regularly scheduled inspections and preventive maintenance activities will be conducted on the groundwater monitoring system, subject to specific groundwater monitoring compliance conditions and frequencies stipulated by the EPA Final CCR Rule.

The groundwater monitoring system will be maintained and monitored in accordance with the CCR Rule Groundwater Monitoring Plan. The monitoring system, sampling and analysis program will be continued during the post-closure period, unless the closure plan is modified to establish a different system or program.

4.2 CONTACT INFORMATION

The following contact information is provided for the post-closure period:

Owner: Tennessee Valley Authority (TVA)

Contact: Civil Projects & CCP Management, Strategy and Engineering
Tennessee Valley Authority
1101 Market Street
Chattanooga, Tennessee 37402

Phone: 844-342-0012

Email: tvainfo@tva.com

4.3 PLANNED USES

TVA currently has no plans for commercial, recreational, or industrial use of the property during the post-closure care period.