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October 12, 2016  
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Revision 0

Tennessee Valley Authority  
1101 Market Street  
Chattanooga, Tennessee 37402

**RE: Closure and Post-Closure Plan  
Bottom Ash Pond and Stilling Pond (including Retention Pond)  
EPA Final Coal Combustion Residuals (CCR) Rule  
TVA Cumberland Fossil Plant  
Cumberland City, Tennessee**

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## **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 Bottom Ash Pond and Stilling Pond (including Retention Pond).

## **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 the completion of all necessary environmental reviews. It is therefore 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;



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Bottom Ash Pond and Stilling Pond (including Retention Pond)  
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 Bottom Ash Pond and Stilling Pond (including Retention Pond) meets the requirements described in 40 CFR 257.102(b); and
4. that the post-closure plan for the TVA Cumberland Fossil Plant's Bottom Ash Pond and Stilling Pond (including Retention Pond) 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  
Bottom Ash Pond and Stilling  
Pond (including Retention Pond)  
Stewart County, Tennessee



Prepared for:  
Tennessee Valley Authority  
Chattanooga, Tennessee

Prepared by:  
Stantec Consulting Services Inc.  
Louisville, Kentucky

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## CLOSURE AND POST-CLOSURE PLAN

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### 1.0 INTRODUCTION

This Coal Combustion Residuals (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 Cumberland Fossil Plant to ensure that the Bottom Ash Pond and Stilling Pond (including Retention Pond) 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 Bottom Ash Pond and Stilling Pond (including Retention Pond) are CCR surface impoundments and therefore subject to the EPA Final CCR Rule. The two ponds are hydraulically connected by the North Ditch facilitating design of a joint and sequenced closure, and are therefore included in this combined closure and post-closure plan.

TVA is subject to the National Environmental Policy Act, and pursuant to that statute has performed a programmatic environmental impact statement analyzing the environmental impacts resulting from the two primary closure methods set forth in the EPA Final CCR Rule, as well as a “no action” alternative. At a programmatic level, TVA determined that closure-in-place would have fewer overall adverse environmental impacts than closure-by-removal and generally would be environmentally preferable. In addition, TVA performed a site-specific review of 10 CCR impoundments that tiers off the programmatic level review. To the extent a site-specific review has not been performed, the closure method set forth in this document is a preferred alternative still pending further environmental review.

### 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.*

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- (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 Bottom Ash Pond and Stilling Pond (including Retention Pond) will be closed in place. Each impoundment will undergo dewatering and waste stabilization and will be regraded and capped with a final cover.

The operational pool drawdown will include the removal of free water and pore water within the Bottom Ash Pond and Stilling Pond (including Retention Pond). The resulting CCR material will be stabilized in place to allow for regrading.

Following stabilization, the CCR material within each CCR Unit will be balanced and regraded to promote drainage. Once CCR regrading is complete, in-place closure of each Unit will be performed. This work includes preparing the subgrade followed by installation of a final geomembrane cap system encompassing the CCR material footprints. The cap system will consist of a geosynthetics – soil matrix.

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The section of the North Ditch connecting the Bottom Ash Pond and Stilling Pond (including Retention Pond) will be closed with a geomembrane cap system during the Stilling Pond (including Retention Pond) closure. Portions of the ditch outside of the Dry Ash Stack permitted waste boundary will be closed in place. To prevent “contact” water from flowing over closed areas, the cap system in the North Ditch and Bottom Ash Pond shall be installed prior to installation of the cap system in the Stilling Pond (including Retention Pond).

Stormwater drainage improvements will be implemented during final closure of each Unit. Prior to installation of the cap system, minor grading of existing ditches and construction of new ditches will be completed to improve drainage of the closed facilities. Following completion of the final cover installation in the Stilling Pond (including Retention Pond) and North Ditch, new stormwater outfalls will be installed to convey stormwater to Wells Creek or the existing Discharge Channel. Stormwater drainage in the Bottom Ash Pond will be directed to the North Ditch and new pipes will be installed to convey drainage beneath the existing access road to the Stilling Pond (including Retention Pond) to the north.

## 2.2 CLOSURE TYPE

### 2.2.1 Closure in place

Conceptually, the CCR in the Bottom Ash Pond and Stilling Pond (including Retention Pond) will be dewatered, stabilized, and regraded within the existing pond footprints. Therefore, the closure of the Bottom Ash Pond and Stilling Pond (including Retention Pond) will be accomplished by leaving the CCR in place. 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 Bottom Ash Pond and Stilling Pond (including Retention Pond) in line with the aforementioned CCR closure by removal standards.

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### 2.3 MAXIMUM CCR INVENTORY

Based on available records, it is assumed that the maximum inventory of CCR on-site is consistent with the current volumes, which are estimated to be 1.1 million cubic yards in the Stilling Pond (including Retention Pond) and 334,000 cubic yards in the Bottom Ash Pond. These volumes were estimated using hydrographic survey information (2015 TVA) and comparing to pre-construction topographic information shown on TVA drawing 10N212.

### 2.4 LARGEST AREA REQUIRING FINAL COVER

Based on available records, it is assumed that the estimated largest area of the Bottom Ash Pond and Stilling Pond (including Retention Pond) requiring a final cover during the active life of the CCR unit is consistent with the current areas. These areas are estimated to be approximately 55 acres and 7 acres, for the Stilling Pond (including Retention Pond) and Bottom Ash Pond, respectively. These areas were estimated using 2015 topographic survey information provided by TVA.

### 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 any 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.	Dewatering, stabilization, and regrading of surface impoundment(s)	61
3.	Installation of final cover	1160
4.	Establish vegetative cover	1220
5.	Completion of post-closure care period	Add 30 years to completion of closure

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### 2.6 ESTIMATED YEAR OF CLOSURE COMPLETION

The estimated year for completion of closure activities is 2042. 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 five years for completion of closure of a surface impoundment 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 units according to acceptable, permeability compliance limits. The cap system will also act to cover, control, and prevent the release of CCR material

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from the units, into surface waters and the atmosphere. The designed grading plan and stormwater management system promotes positive drainage and limits infiltration into the CCR materials. The cap cover is designed to limit the exposure of CCR material to the atmosphere.

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

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

- 40-mil textured LLDPE flexible geomembrane
- Double-sided geocomposite drainage layer with nonwoven, needle-punched geotextile
- 18-inches protective cover soil
- 6-inches vegetative cover soil

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.

### **Geosynthetic Materials**

The geomembrane will cover the Bottom Ash Pond and Stilling Pond (including Retention Pond) CCR material footprints, and the geocomposite drainage layer will be placed above it. The geomembrane will be placed directly on the CCR material following regrading. The drainage layer will 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 over the geocomposite drainage layer within the final cover system. A borrow study has been completed within the vicinity of the plant. Based on results of the borrow study, suitable soil material is readily available in the area.

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### 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 Bottom Ash Pond and Stilling Pond (including Retention Pond) 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 sites, while the impoundment of CCR sediment or slurries at the units will be deterred by the cap covering of the CCR material in the units, including exposure to the atmosphere.

In addition to the implementation of a cap system that meets infiltration requirements, a stormwater management system will be incorporated. During final closure, existing ditches will be graded and new ditches and stormwater outfalls will be constructed to improve drainage of the closed facilities. Construction will be sequenced such that flows to each pond are rerouted prior to closure.

To prevent "contact" water from leaving the site, new outfalls will not be made available for use until such time that the drainage area for that outfall has the final cap completed. EPSC measures will be put in place at each outfall until such time that vegetation is established upstream.

For each closed facility, 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 and geocomposite stone outlets. These collection drains and outlets will consist of combinations of crushed stone, geotextile fabric, and/or pipe that outlet within the perimeter ditches and outfalls.

Where pipes penetrate the geosynthetic cover system, pipe boots will be utilized to prevent "contact" water from entering the perimeter ditches and outfalls.

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### 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 stabilize the cap and slopes, and 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.*

Section 2.1 addresses the operational drawdown of the Bottom Ash Pond and Stilling Pond (including Retention Pond). It provides for the removal of the free water and pore water within the surface impoundments, and the stabilization of the remaining CCR material.

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### 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  $1 \times 10^{-5}$  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.*

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### 3.3.1 Final Cover System Design Standards

TVA will 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 final cover 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 value 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 Bottom Ash Pond and Stilling Pond (including Retention Pond), as per 40 CFR 257.102(g).

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### 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.*

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In accordance with 40 CFR 257.104(d)(1)(i), post-closure care for the Bottom Ash Pond and Stilling Pond (including Retention Pond) 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.

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- 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

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### **4.3 PLANNED USES**

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