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To: [Water Permits](#)
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Subject: [EXTERNAL] BRF NPDES Permit No. TN0005410_Wastewater Treatment Upgrades to comply with ELG_2022 Annual Report_Ltr.pdf
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Kim Howell
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Sent Via Electronic Transmittal

January 26, 2023

Mr. Vojin Janjić (water.permits@tn.gov)
Division of Water Resources
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and Conservation
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Dear Mr. Janjić

TENNESSEE VALLEY AUTHORITY (TVA) – BULL RUN FOSSIL PLANT (BRF) – NPDES
PERMIT NO. TN0005410 – WASTEWATER TREATMENT UPGRADES TO COMPLY WITH
EFFLUENT LIMITATION GUIDELINES (ELG) – 2022 ANNUAL REPORT

In accordance with Part I.F. of the subject permit, please find enclosed an annual report detailing TVA's progress toward installing the necessary equipment to meet the bottom ash transport water ELGs.

If you have questions or need any additional information, please contact Steed Stagnolia at (865) 945-7290 or by e-mail at skstagnolia@tva.gov.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Sincerely,



Terry L. Gamble
Plant Manager
Bull Run Fossil Plant

Enclosure

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SKS:KDH

Enclosure

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Wet FGD Wastewater Treatment & Bottom Ash ELG Project Updates

TVA Bull Run Fossil Plant – NPDES permit no. TN0005410

2022 Annual Report

2022 calendar year update:

TVA has announced that the Bull Run Fossil Plant will retire by December 1, 2023. TVA is not currently planning any additional upgrades for wet flue gas desulfurization (FGD) wastewater treatment (WWT) or bottom ash transport water (BATW) systems at this site.

General Information:

Effluent Limitations Guidelines NPDES Permit Requirement and Regulations

Part I.F. of the NPDES permit for Bull Run Fossil (BRF) requires the Tennessee Valley Authority (TVA) to provide the Tennessee Department of Environment and Conservation (TDEC) with an annual report detailing progress achieved during the preceding calendar year as well as identification of upcoming projects needed to attain compliance with EPA's Effluent Limitation Guidelines (ELGs). These update reports are due by January 31 of the following year.

TVA presented information requesting an ELG applicability date for all wet FGD ELGs and achieving the 2015 no discharge requirement for BATW of December 1, 2023, at Bull Run Fossil (BRF) plant. TDEC granted that timetable in the NPDES permit issued in 2018.

On October 13, 2020, the United States Environmental Protection Agency published revisions to the ELGs in 40 CFR Part 423. The revised rule modifies technology-based effluent limitations for FGD wastewater and BATW. The rule also establishes several new subcategories that provide separate compliance pathways based on unit operation and asset operating plans.

The EPA established a new subcategory for facilities planning to cease coal combustion by December 31, 2028, ("retirement subcategory"). Best available technology economically achievable (BAT) effluent limitations for FGD wastewater and BATW discharges in the retirement subcategory are equivalent to the limits for total suspended solids (TSS) in § 423.12(b)(11) and § 423.12(b)(4), respectively. In 40 CFR 423.19(f), the ELG Rule lists the requirements for the retirement subcategory which include submission of a NOPP with specified contents as well as an annual progress report that provides updates on the NOPP contents.

On October 6, 2021, TVA submitted a NOPP and confirmed the retirement subcategory for FGD wastewater and BATW for the only coal combustion unit at BRF. On August 30, 2022, TDEC issued BRF's draft NPDES permit incorporating effluent limits for FGD and BATW discharges in alignment with the retirement subcategory. TDEC held a public meeting January 12, 2023, and received comments on the draft permit, yet to be issued. In the interim, TVA submitted an NPDES permit renewal application on October 26, 2022, in accordance with the 180 day advance submittal required prior to the existing permit's expiration.

The Energy Resource Options presented in TVA's 2019 Integrated Resource Plan include the planned retirement of BRF. The expected date to achieve permanent cessation of coal combustion is December 1, 2023. Milestones that either have been completed or would need to be completed to achieve retirement are listed in the table below:

Milestone	Activity	Date Completed
Integrated Resource Plan	TVA posted the final Record of Decision for the 2019 IRP.	September 17, 2019
National Environmental Policy Act (NEPA) Review	TVA published an Environmental Assessment on the Potential Retirement of Bull Run Fossil Plant and issued a Finding of No Significant Impact	February 11, 2019
Decision to Retire BRF	TVA Board of Directors voted to retire BRF by December 1, 2023	February 14, 2019
Cessation of Coal Combustion Activities	TVA will cease coal combustion at BRF	December 1, 2023