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Sent Via Electronic Transmittal

October 6, 2021

Mr. Vojin Janjić (Water.Permits@tn.gov)
Manager, Water-Based Systems
Tennessee Department of Environment
and Conservation (TDEC)
William R. Snodgrass Tennessee Tower
312 Rosa L. Parks Avenue, 11th Floor
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Dear Mr. Janjić:

TENNESSEE VALLEY AUTHORITY (TVA) – BULL RUN FOSSIL PLANT (BRF) – NPDES PERMIT NO. TN0005410 – EFFLUENT LIMITATION GUIDELINES NOTICE OF PLANNED PARTICIPATION (NOPP)

On October 13, 2020, the United States Environmental Protection Agency (EPA) published revisions to the Steam Electric Effluent Limitation Guidelines (ELGs) in 40 CFR Part 423. The revised rule modifies technology-based effluent limitations for Flue Gas Desulfurization (FGD) wastewater and Bottom Ash Transport Water (BATW). In setting stringent new effluent limitations, EPA recognized the need to provide compliance flexibility by establishing new subcategories that provide different compliance pathways based on unit operation and asset operating plans and by allowing transfers between subcategories.

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 February 14, 2019, the TVA Board of Directors voted to retire BRF by December 1, 2023. This letter serves as TVA’s NOPP in the retirement subcategory for FGD wastewater and BATW for the only coal combustion unit at BRF. The expected date to achieve permanent cessation of coal combustion is December 1, 2023. TVA is not regulated by a public service commission; therefore, approval of this regulatory body is not applicable. The Energy Resource Options presented in TVA’s 2019 Integrated Resource Plan include the planned retirement of BRF. Milestones that either have been completed or would need to be completed to achieve retirement are listed in the table below:

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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

Annual progress reports detailing BRF's progress toward completing the milestones will be submitted to TDEC. If you have questions or need additional information, please contact Crystal Bishop at (423) 314-3820 or by email at clbishop0@tva.gov.

Sincerely,



Paul Pearman
Senior Manager
Water Permits, Compliance, and Monitoring

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Enclosures

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