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**Sent Via Electronic Transmittal**

January 22, 2026

Ms. Sarah Terpstra (Water.Permits@tn.gov)  
Division of Water Resources  
Tennessee Department of Environment  
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Dear Ms. Terpstra,

TENNESSEE VALLEY AUTHORITY (TVA) – GALLATIN FOSSIL PLANT (GAF) – NPDES PERMIT NO. TN0005428 – WASTEWATER TREATMENT UPGRADES TO COMPLY WITH EFFLUENT LIMITATION GUIDELINES (ELG) – 2025 ANNUAL REPORT

In accordance with Part I.F of the Gallatin Fossil Plant (GAF) NPDES permit, please find enclosed the 2025 Annual Report. This report provides an update on TVA's progress toward compliance with the bottom ash transport water (BATW) limits and outlines actions taken during the past year to meet the 2020 ELG requirements.

If you have questions or need any additional information, please contact Michael Gray at (615) 230-4066 or by e-mail at [mgray@tva.gov](mailto:mgray@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,

A handwritten signature in black ink, appearing to read "W. Ashley Donoho". The signature is fluid and cursive, with a large loop at the end.

W. Ashley Donoho  
Plant Manager  
Gallatin Fossil Plant

Enclosure

Ms. Sarah Terpstra  
Page 2  
January 22, 2026

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# Bottom Ash ELG Project Updates

## TVA Gallatin Fossil Plant – NPDES Permit No. TN0005428

### 2025 Annual Report

#### Introduction

Part I.F. of the Gallatin Fossil (GAF) National Pollutant Discharge Elimination System (NPDES) permit requires the Tennessee Valley Authority (TVA) to submit an annual report to the Tennessee Department of Environment and Conservation (TDEC) detailing progress achieved during the preceding calendar year as well as identification of upcoming efforts needed to attain compliance with the United States Environmental Protection Agency's (EPA) Effluent Limitations Guidelines (ELGs). These update reports are due by January 31 of the following year.

#### Effluent Limitations Guidelines – NPDES Permit Requirements and Regulatory Updates

On October 13, 2020, the EPA published revisions to the Steam Electric ELGs in 40 CFR Part 423, modifying technology-based effluent limitations for flue gas desulfurization (FGD) wastewater and bottom ash transport water (BATW). GAF has a dry scrubber; therefore, the ELGs for FGD wastewater are not applicable. The 2020 rule replaced the previous no-discharge requirement for BATW with a provision allowing discharge of up to 10 percent of the wetted system volume under specific conditions.

On May 9, 2024, the EPA finalized a Clean Water Act regulation that revised the technology-based ELGs for the steam electric power generating point source category applicable to FGD wastewater, BATW, and legacy wastewater at existing sources and combustion residual leachate (CRL) at new and existing sources. In addition, the rule amends the subcategories for separate compliance pathways based on unit and asset operating plans. Subsequently, on December 23, 2025, EPA finalized the ELG Deadline Extension Rule (published in the Federal Register on December 31, 2025, and will be in effect on March 2, 2026). This rule extends specific compliance and Notice of Planned Participation (NOPP) deadlines in the 2024 ELG rule revision and grants state permitting authorities additional flexibility to extend deadlines based on demand, reliability, and supply chain concerns. It also allows transfer from the 2034 PCCC subcategory into the Generally Applicable category, and vice versa.

GAF's current NPDES permit reflects the 2020 ELGs, and TVA has installed a BATW recirculation system to achieve compliance. Based on the requirement in 40 CFR 122.62(a), on August 6, 2024, TVA submitted a request to modify GAF's NPDES permit to incorporate revised limitations consistent with the 2024 ELG rule and multiple asset operating scenarios. TVA will submit a subsequent permit modification request to incorporate the new 2025 Deadline Extension Rule. Although the 2024 ELG revisions are not yet incorporated into GAF's permit, GAF submitted its NOPP on December 30, 2025, to preserve eligibility for the 2034 Permanent Cessation of Coal (PCCC) subcategory.

TVA is updating the agency's [Integrated Resource Plan \(IRP\)](#), which evaluates long-term energy resources, generation strategies, and power supply. This process will guide TVA decision making and asset strategy for managing TVA's coal fleet into the future. Therefore, TVA requested GAF's NPDES permit reflect compliance deadlines for regulated waste streams under each available 2024 ELG category or sub-category.

## 2025 Bottom Ash Transport Water System Activities Summary

The BATW recirculation system is in operation and TVA will continue to address any warranty and O&M issues.