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Sent Via Electronic Submittal

December 30, 2025

Ms. Sarah Terpstra
(e-mail: Sarah.Terpstra@tn.gov)
Manager
Water Based Systems
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Tennessee Department of Environment
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Dear Ms. Terpstra:

TENNESSEE VALLEY AUTHORITY (TVA) – GALLATIN FOSSIL PLANT (GAF) – NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES) PERMIT NO. TN0005428 – EFFLUENT LIMITATION GUIDELINES (ELG) NOTICE OF PLANNED PARTICIPATION (NOPP)

On May 9, 2024, the United States Environmental Protection Agency (EPA) published revisions to the Steam Electric ELGs in 40 CFR Part 423. The revised rule modifies technology-based effluent limitations for four waste streams: flue gas desulfurization (FGD) wastewater, bottom ash transport water (BATW), combustion residual leachate (CRL), and unmanaged CRL (UCRL). The rule also established a subcategory for facilities planning to cease coal combustion by December 31, 2034, (“retirement subcategory”). This subcategory allows facilities that are scheduled to permanently cease coal combustion by the 2034 deadline to continue operating under the standards of the 2020 ELGs until their scheduled retirement date.

To preserve the option of participating in the retirement subcategory by ceasing coal combustion by December 31, 2034, pending the TVA Board of Directors’ decision, this NOPP is submitted in accordance with the requirements set forth in the 2024 ELGs and pertains specifically to the retirement subcategory for GAF. Since 1956, GAF has been a significant contributor to TVA’s energy generation portfolio. To ensure reliability of the system, retirement of TVA’s coal plants is dependent upon replacement capacity being approved and ready for commercial operations and upon the regulatory requirements in place at that time. The formal decision to retire GAF will be made subject to future environmental review.

While this NOPP presents the best information available, TVA has identified the following factors that could result in changes to the information submitted in this NOPP:

- Regulatory Changes – On October 2, 2025, EPA published the 2025 ELG Deadline Extension Rule, and on December 23, 2025, the final rule's Prepublication Federal Register Notice was issued. EPA's rulemaking or other potential future regulatory changes (including future regulatory changes that result from litigation) could impact TVA's ELG compliance strategy, including TVA's participation in the 2034 retirement subcategory.
- Replacement Generation – Timing for the development of replacement generation is contingent upon multiple factors, including environmental permitting, engineering, design, and procurement, including supply chain constraints. This may also include construction of new, or upgrades to existing, infrastructure, such as transmission lines or substations.
- Integrated Resource Planning (IRP) – TVA will submit its next IRP to the TVA Board of Directors in 2026. Additional modelling and other analyses conducted in conjunction with that submittal may result in changes to this NOPP.
- Grid Reliability – Based on electricity demand forecasts and resource data, TVA may be required to alter its proposed retirement schedule in order to meet transmission reserve requirements.

The factors detailed above could result in changes to TVA's ELG compliance strategy and may result in modification of this NOPP. TVA will submit appropriate documentation, pursuant to 40 C.F.R. § 423.19(h)(3), if changes to the NOPP are needed or to transfer to other compliance options pursuant to 40 C.F.R. § 423.19(l).

40 CFR 423.19(h) lists the requirements for the 2034 retirement subcategory which include submission of a NOPP as well as annual progress reports that provide updates on the interim milestones listed below. As required by 40 CFR 423.19(h)(2), the expected date that TVA will achieve permanent cessation of coal combustion for GAF's four electric generating units (EGUs) is no later than December 31, 2034. TVA is not regulated by a public service commission; therefore, approval of this regulatory body is not applicable. Finally, the NOPP shall also include, for each such EGU, a certification statement that the facility is in compliance with §423.13(g)(1) and § 423.13(k)(1). GAF does not produce FGD wastewater so §423.13(g)(1) is not applicable to the facility. A BATW recirculation system was installed prior to December 31, 2025, and has demonstrated compliance with §423.13(k)(1).

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
2020 ELG compliance	GAF installed and operated a BATW recirculation system, with a 10% purge allowance.	August 17, 2023
Integrated Resource Plan	TVA posted the final Record of Decision for the 2019 IRP	September 17, 2019
National Environmental Policy Act (NEPA) Review	TVA will conduct an environmental review to assess the impacts associated with the future proposed retirement of GAF (including decommissioning and demolition) and the replacement generation alternatives	To be determined
Decision to Retire GAF	TVA Board of Directors vote to make decision on GAF retirement	To be determined
Cessation of Coal Combustion Activities	If approved, TVA will cease coal combustion at GAF	Must be no later than December 31, 2034, to participate in the 2034 retirement subcategory

Annual progress reports detailing GAF's progress toward completing the milestones will be submitted to TDEC contingent to the factors listed above. If you have questions or need additional information, please contact Callan Pierson by email at cperson@tva.gov.

Sincerely,



Susan Jacks
Senior Manager
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