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Sent Via Electronic Transmittal

January 27, 2026

Ms. Sarah Terpstra (water.permits@tn.gov)
Division of Water Resources
Tennessee Department of Environment
and Conservation
Davy Crockett Tower
500 James Robertson Parkway
Nashville, TN 37243

Dear Ms. Terpstra,

TENNESSEE VALLEY AUTHORITY (TVA) – KINGSTON FOSSIL PLANT (KIF) – NPDES PERMIT NO. TN0005452 – WASTEWATER TREATMENT UPGRADES TO COMPLY WITH EFFLUENT LIMITATION GUIDELINES (ELG) – 2025 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 wet flue gas desulfurization and bottom ash transport water ELGs.

If you have questions or need any additional information, please contact Adele Dennison at (865) 717-2157 or by e-mail at amdennison@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 blue ink that reads "Jeffrey A. Kickert". The signature is written in a cursive style.

Jeffrey A. Kickert
Plant Manager
Kingston Fossil Plant

Enclosure

Ms. Sarah Terpstra
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ELG Permanent Cessation of Coal Combustion Progress Updates

TVA Kingston Fossil Plant – NPDES permit No. TN0005452

2025 Annual Report

Introduction

Part I.F. of the Kingston Fossil Plant (KIF) National Pollutant Discharge Elimination System (NPDES) permit requires the Tennessee Valley Authority (TVA) to provide an annual progress report to the Tennessee Department of Environment and Conservation (TDEC) detailing progress achieved during the preceding calendar year as well as identification of upcoming projects needed to attain compliance with EPA’s Effluent Limitations Guidelines (ELGs) for flue gas desulfurization (FGD) wastewater and bottom ash transport water (BATW) treatment. This update report is due by January 31 of the following year.

In 40 CFR 423.19(g), the ELG Rule requires submittal of an annual progress report detailing the status of milestones referenced in TVA’s Notice of Planned Participation (NOPP) for the 2028 Permanent Cessation of Coal (PCCC) subcategory¹ of the ELGs.

2025 Calendar Year Update

On February 23, 2024, TVA released a final Environmental Impact Statement (EIS) evaluating the retirement of KIF and alternatives for replacement generation. Based on this alternatives analysis, TVA issued a Record of Decision on April 2, 2024, to retire all coal combustion generating units at KIF and proceed with construction of combined cycle/aeroderivative natural gas plant, battery storage, and solar installation. The timeline for cessation of coal combustion at KIF remains within that allowable under the 2028 PCCC ELG retirement subcategory.

See below for a listing of milestones submitted with KIF’s NOPP in the retirement subcategory:

Milestone	Activity	Date
Integrated Resource Plan	TVA posted the final Record of Decision for the 2019 IRP.	September 17, 2019
National Environmental Policy Act (NEPA) Review	Publish Environmental Impact Statement (EIS) assessing impacts associated with the proposed retirement of KIF and replacement generation alternatives	February 23, 2024
Decision to Retire KIF	Record of Decision published in Federal Register	April 2, 2024
Cessation of Coal Combustion Activities	Cease coal combustion at KIF	On or before December 31, 2028

KIF’s NPDES permit expired on February 28, 2023, and has remained in administratively continued status throughout calendar year 2025. TVA applied for KIF’s NPDES permit reissuance on August 30, 2022, in accordance with the 180-day advance submittal required for permit coverage continuance past expiration until the renewal is issued.

¹ The phrase '2028 Permanent Cessation of Coal' is synonymous with the 'retirement subcategory,' and both terms are used interchangeably throughout relevant documentation.

Regulatory & Compliance Developments

Effluent Limitations Guidelines – Regulatory Updates

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

For facilities planning to cease coal combustion by December 31, 2028, a retirement subcategory was established. Best available technology economically achievable effluent limitations for FGD wastewater and BATW discharges in the retirement subcategory are equivalent to those previously established in the 2015 ELGs.

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 NOPP deadlines in the 2024 ELG rule revision and grants state permitting authorities additional flexibility to extend deadlines, including those in the 2020 ELGs, based on demand, reliability, and supply chain concerns.

Notices of Planned Participation - Cessation of Coal Combustion Activities

On October 6, 2021, TVA submitted a NOPP in the 2028 PCCC subcategory for FGD wastewater and BATW for the nine coal combustion units at KIF. On April 2, 2024, TVA issued a Record of Decision announcing the retirement of KIF. This decision aligns with TVA's NOPP for the 2028 retirement subcategory of the 2020 ELGs.

TVA has filed Annual Progress Reports for the 2028 PCCC subcategory to TDEC in January 2021, 2022, 2023, and 2024.

On December 30, 2025, TVA submitted a subsequent NOPP for the 2034 PCCC subcategory for Combustion Residual Leachate (CRL), which was not addressed in the 2020 Effluent Limitation Guidelines.

KIF NPDES Permit TN0005452 Modification Requests

On December 1, 2021, TDEC issued a modified NPDES KIF permit TN005452 for authorized discharges. The modified NPDES permit incorporates alternative compliance pathways with corresponding compliance dates for applicable ELG categories and subcategories. The reissued permit also specifies KIF's status in the retirement subcategory of the 2020 ELGs.

Based on the requirement in 40 CFR 122.62(a), TVA applied for an NPDES permit modification on August 6, 2024, pursuant to the 2024 revised ELGs, to incorporate revised limitations based

on multiple asset operating scenarios. TVA will submit a subsequent permit modification request to incorporate the new 2025 Deadline Extension Rule.

Integrated Resource Plan

TVA is updating the agency's [Integrated Resource Plan](#), which evaluates long-term energy resources, electric generation, and power supply strategies. This process will best inform TVA decision making and asset strategy for managing TVA's coal fleet into the future.

Wet FGD and Bottom Ash Transport Water 2025 Projects Activities Update

There are no ongoing projects for ELG compliance in 2025. TVA will continue to address any warranty and operation and maintenance (O&M) issues.