



Memorandum from the Office of the Inspector General

September 30, 2025

Robert Bryan Williams

**REQUEST FOR MANAGEMENT DECISION – EVALUATION 2025-17544 – INSPECTION
AND MAINTENANCE OF COAL COMBUSTION RESIDUAL STORAGE FACILITIES**

Attached is the subject final report for your review and management decision. Your written comments, which addressed your management decision and actions ongoing or planned for six of the eight recommendations, have been incorporated into the report. Please advise us of your management decision on the remaining recommendations within 60 days from the date of this report. In accordance with the Inspector General Act of 1978, as amended, the Office of the Inspector General is required to report to Congress semiannually regarding audits that remain unresolved after 6 months from the date of report issuance.

If you have any questions or wish to discuss our findings, please contact Lindsay J. Denny, Director, Evaluations-Operations, at (865) 633-7349. We appreciate the courtesy and cooperation received from your staff during the audit.

Greg Stinson
Assistant Inspector General
(Audits and Evaluations)

LWC:FAJ

Attachment

cc (Attachment):

TVA Board of Directors
Jessica Dufner
Tracy E. Hightower
Jill M. Matthews
Donald A. Moul
Ronald R. Sanders II
Rebecca C. Tolene
Michael S. Turnbow
Ben R. Wagner
OIG File No. 2025-17544



Office of the Inspector General

Evaluation Report

To the Senior Vice President,
Generation Projects and
Fleet Services

INSPECTION AND MAINTENANCE OF COAL COMBUSTION RESIDUAL STORAGE FACILITIES

Evaluation Team
Lucas W. Cotter
Kenneth H. Sims - Trey

Evaluation 2025-17544
September 30, 2025

ABBREVIATIONS

CCR	Coal Combustion Residual
GP&FS	Generation Projects and Fleet Services
SVP	Senior Vice President
TVA	Tennessee Valley Authority
Widows Creek	Widows Creek Fossil Plant

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MEMORANDUM DATED SEPTEMBER 26, 2025, FROM SCOTT TURNBOW
TO GREG STINSON



Evaluation 2025-17544 – Inspection and Maintenance of Coal Combustion Residual Storage Facilities

EXECUTIVE SUMMARY

Why the OIG Did This Evaluation

In April 2015, the United States Environmental Protection Agency published the *Disposal of Coal Combustion Residuals [CCR] from Electric Utilities* (commonly referred to as the CCR Rule), which set forth national regulations for the safe disposal of coal ash from coal-fired power plants. On May 8, 2024, the United States Environmental Protection Agency finalized changes to the CCR Rule to include additional classes of regulated CCR storage facilities,ⁱ including inactive surface impoundmentsⁱⁱ at inactive electric utilities, referred to as "legacy CCR surface impoundments."

The CCR Rule requires that applicable CCR units be inspected both weekly for any appearances of actual or potential structural weakness and annually to ensure that the design, construction, operation, and maintenance of the CCR unit is consistent with recognized engineering standards. In addition, the CCR Rule requires monthly monitoring of all CCR unit instrumentationⁱⁱⁱ for surface impoundments.

Due to recent updates to CCR regulations, we performed an evaluation to determine if TVA is performing required inspections and maintenance of CCR storage facilities.

What the OIG Found

We determined TVA performed required inspections and maintenance of CCR storage facilities. Specifically, TVA performed all (1) weekly and annual inspections and (2) monthly monitoring required by the CCR Rule during the evaluation scope. Additionally, inspections identified no significant deficiencies, and all deficiencies^{iv} and high priority^v

ⁱ CCR storage facilities maintained by TVA are surface impoundments or landfills. A CCR landfill is an area of land or an excavation that contains CCR, and which is not a surface impoundment.

ⁱⁱ A surface impoundment is a natural topographic depression, man-made excavation, or diked area, which is designed to hold an accumulation of CCR and liquids, and the unit treats, stores, or disposes of CCR.

ⁱⁱⁱ The Tennessee Valley Authority (TVA) utilizes instrumentation to monitor pressure, water levels, settlement, and deformations of slopes at CCR storage facilities.

^{iv} Significant deficiencies indicate that the integrity of a significant or high hazard potential water retaining structure (potential loss of life and/or significant property damage) could be in jeopardy if corrective action is not taken. Annual inspection reports define deficiencies as issues that require actions ranging from continued monitoring to immediate correction.

^v Instrument maintenance issues are prioritized in the instrument maintenance log on a scale of 1-4. We determined, based on documentation and feedback from TVA, that Level 1 and 2 issues were high priority.



Evaluation 2025-17544 – Inspection and Maintenance of Coal Combustion Residual Storage Facilities

EXECUTIVE SUMMARY

instrumentation maintenance issues identified were resolved timely or had plans in place for resolution.

However, we also determined (1) TVA did not maintain a comprehensive list of instrumentation requiring monitoring, (2) some issues were not identified in inspections and some instrumentation issues were not resolved, (3) remediation of minor issues identified during annual inspections was not documented, (4) annual inspection reports did not document review of weekly inspections, and (5) some inspectors did not have required training.

What the OIG Recommends

We made recommendations to the Senior Vice President, Generation Projects and Fleet Services, related to (1) instrumentation documentation, (2) identification and resolution of issues, (3) documentation of corrective maintenance performed, (4) completeness of annual inspection reports, and (5) training for personnel performing inspections. Detailed recommendations are included in the body of the report.

TVA Management's Comments

Prior to issuing their formal response, TVA management reviewed the draft report and provided informal comments that have been incorporated into the final report as appropriate. In their formal response, TVA management agreed with the recommendations and provided ongoing or planned actions to address six of the eight recommendations. See the Appendix for management's complete response.

Auditor's Response

We concur with TVA management's ongoing and planned actions.

BACKGROUND

In April 2015, the United States Environmental Protection Agency published the *Disposal of Coal Combustion Residuals [CCR] from Electric Utilities* (commonly referred to as the CCR Rule), which set forth national regulations for the safe disposal of coal ash from coal-fired power plants. The 2015 rule-imposed requirements on inactive surface impoundments¹ at active facilities but did not impose requirements on inactive surface impoundments at inactive facilities. As of fiscal year 2024, the Tennessee Valley Authority (TVA) maintained 32 regulated CCR storage facilities² across ten current or former coal plants.

On May 8, 2024, the United States Environmental Protection Agency finalized changes to the CCR Rule to include additional classes of regulated CCR storage facilities, including inactive surface impoundments at inactive electric utilities, referred to as "legacy CCR surface impoundments." The initial compliance deadline for legacy surface impoundments was November 8, 2024. These changes have resulted in the addition of one legacy CCR surface impoundment at Widows Creek Fossil Plant (Widows Creek).

The CCR Rule requires both weekly and annual inspections of CCR storage facilities for any appearances of actual or potential structural weakness and other conditions that have the potential to disrupt the operation or safety of the CCR unit. The rule also requires monthly monitoring of all CCR unit instrumentation³ for surface impoundments.

TVA's CCR Structural Stability Program establishes formal governance and oversight, in accordance with the CCR Rule, to protect lives, property and the environment by ensuring that CCR storage facilities within the program are designed, constructed, operated, and maintained as safely and reliably as practicable. Within the CCR Structural Stability Program are several guidance documents, including *Performance Monitoring of CCR Storage Facilities*, which establishes program requirements such as performance monitoring implementation, inspection types, and training standards for all personnel conducting inspections. As of September 30, 2024, TVA had spent approximately \$3.2 billion on its CCR Program, which includes requirements for the closure of facilities, post-closure maintenance, monitoring, and inspections. Through 2029, TVA expects to spend an additional \$2.4 billion on its CCR Program.

Due to recent updates to CCR regulations, we performed an evaluation of TVA's required inspections and maintenance of CCR storage facilities.

¹ A surface impoundment is a natural topographic depression, man-made excavation, or diked area, which is designed to hold an accumulation of CCR and liquids, and the unit treats, stores, or disposes of CCR.

² CCR storage facilities maintained by TVA are surface impoundments or landfills. A CCR landfill is an area of land or an excavation that contains CCR and is not a surface impoundment.

³ TVA utilizes instrumentation to monitor pressure, water levels, settlement, and deformations of slopes at CCR storage facilities.

OBJECTIVE, SCOPE, AND METHODOLOGY

The objective of this evaluation was to determine if TVA performed required inspections and maintenance of CCR storage facilities. The scope of the evaluation was inspections⁴ and maintenance completed from October 1, 2023, to September 30, 2024. Additionally, our scope included both weekly and monthly inspections at Widows Creek from November 8, 2024, to January 31, 2025. To achieve our objective, we:

- Reviewed the CCR Rule to identify required inspections and maintenance.
- Reviewed the following TVA guidance documents to identify TVA requirements for inspections and maintenance of CCR storage facilities:
 - *CCR Structural Stability Program Governance and Oversight*
 - *Performance Monitoring of CCR Storage Facilities*
- Reviewed all fiscal year 2024 annual inspection reports (10), monthly instrumentation monitoring reports (13),⁵ and a random selection of 55 of 580 weekly inspection reports for the ten sites covered initially under the CCR Rule to determine if inspections were completed as required and corrective maintenance was completed when issues were identified.
- Reviewed all weekly inspection reports (14), and monthly instrumentation monitoring reports (3) for Widows Creek, issued between November 8, 2024, and January 31, 2025, to determine if inspections were completed as required and corrective maintenance was completed when issues were identified.
- Judgmentally selected weekly inspection reports (15),⁶ from inspections immediately before and after annual inspections that identified deficiencies to determine if those deficiencies were identified during weekly inspections.
- Reviewed training records for the inspectors who conducted the weekly and annual inspections we reviewed in our testing to determine if they had taken required training.

This evaluation was conducted in accordance with the Council of the Inspectors General on Integrity and Efficiency's *Quality Standards for Inspection and Evaluation*.

⁴ TVA performs quarterly inspections of its CCR storage facilities; however, our scope included only inspections required by the CCR Rule. Therefore, we reviewed weekly and annual inspection reports and monthly instrumentation monitoring reports.

⁵ All CCR storage facilities are included in a single instrumentation monitoring report, which is to be issued at intervals not to exceed 30 days. Two reports were issued in March 2024, resulting in a total of 13 monthly reports in fiscal year 2024.

⁶ We selected the 4 weekly inspection reports before and after the date of the two annual site inspections that identified deficiencies. One of these inspections was in our original weekly selection. Therefore, the additional selection was 15 inspection reports.

FINDINGS AND RECOMMENDATIONS

We determined TVA performed required inspections and maintenance of CCR storage facilities. Specifically, TVA performed all (1) weekly and annual inspections and (2) monthly monitoring required by the CCR Rule during the evaluation scope. Additionally, inspections identified no significant deficiencies, and all deficiencies⁷ and high-priority⁸ instrumentation maintenance issues identified were resolved timely or had plans in place for resolution.

However, we also determined that (1) TVA did not maintain a comprehensive list of instrumentation requiring monitoring, (2) some issues were not identified in inspections and some instrumentation issues were not resolved, (3) remediation of minor issues identified during annual inspections was not documented, (4) annual inspection reports did not document review of weekly inspections, and (5) some inspectors did not have required training.

TVA DID NOT MAINTAIN A COMPREHENSIVE LIST OF INSTRUMENTATION REQUIRING MONITORING

The CCR Rule requires monitoring of all instrumentation at CCR surface impoundments at intervals not exceeding 30 days. TVA stated their interpretation of this requirement is that all instrumentation refers to the instrumentation needed to inform, assess, and minimize the risk of failure and release of CCR material and does not require every instrument on site to be monitored at least every 30 days. However, TVA does not maintain a comprehensive list of instruments requiring monthly monitoring under the CCR Rule. As a result, we were unable to determine if all instrumentation requiring monitoring was included in the monthly instrumentation monitoring reports.

According to TVA, they maintain a base set of instrumentation as warranted to meet the intent of the CCR Rule based on site-specific conditions, engineering analysis, and operational status of each regulated unit. At select locations, TVA maintains additional instruments to provide supplemental and corollary data sets that facilitate a broader view of site performance that is monitored and reported less frequently than is required by the CCR rule.

TVA contracts with a third-party to perform monthly monitoring and reporting of instrumentation installed at surface impoundments. According to TVA personnel, the contractor relies on files in the TVA operating record, such as previous monthly and annual reports to determine which instrumentation to monitor and include in monthly reports. However, we observed that both monthly and annual

⁷ Significant deficiencies indicate that the integrity of a significant or high hazard potential water retaining structure (potential loss of life and/or significant property damage) could be in jeopardy if corrective action is not taken. Annual inspection reports define deficiencies as issues that require actions ranging from continued monitoring to immediate correction.

⁸ Instrument maintenance issues are prioritized in the instrument maintenance log on a scale of 1-4. We determined, based on documentation and feedback from TVA, that Level 1 and 2 issues were high priority.

reports included outdated or inaccurate instrumentation data. Specifically, we identified instances where (1) reports included inaccurate counts of installed instrumentation, (2) abandoned or decommissioned instrumentation was included in site-instrumentation maps, and (3) installed instrumentation was not included or included at the wrong storage facilities.

Without a comprehensive list of instrumentation requiring monthly monitoring under the CCR Rule, TVA and contractors must rely on files in the TVA operating record, some of which include outdated or inaccurate instrumentation information. This could create confusion or lead to incomplete or inaccurate reporting by the contractors performing the work.

Recommendations – We recommend the Senior Vice President (SVP), Generation Projects and Fleet Services (GP&FS):

- Document the CCR storage facility instrumentation requiring monthly monitoring under the CCR Rule.
- Confirm that instrumentation included in monthly and annual reports is accurate.

TVA Management's Comments – TVA management agreed with our recommendations and stated they would continue to comply with regulatory programs while ensuring the long-term stability of CCR storage facilities and a robust set of documented data. See the Appendix for TVA management's complete response.

SOME ISSUES WERE NOT IDENTIFIED OR RESOLVED

The CCR Rule requires inspections of CCR surface impoundments and landfills for any appearances of actual or potential structural weakness, other conditions that have the potential to disrupt the operation or safety of the CCR unit, and maintenance of the CCR storage facilities. We determined all required inspections were performed; however, (1) weekly inspections could be improved, and (2) some instrumentation maintenance issues were unresolved.

Weekly Inspections Could Be Improved

We found that deficiencies were not identified in weekly inspections. The CCR Rule defines the standard for performing weekly and annual inspections as follows: "inspect for any appearances of actual or potential structural weakness and other conditions which are disrupting or have the potential to disrupt the operation or safety of the CCR unit." During our review of annual inspection reports we noted that three deficiencies were identified; however, the weekly inspection reports for the same time periods did not document the issues. If deficiencies are not being identified in weekly inspections, TVA faces increased risk of noncompliance with the CCR Rule and issues going unresolved.

Some Instrumentation Maintenance Issues Were Unresolved

The monthly instrumentation monitoring reports we reviewed identified 48 issues that warranted corrective maintenance. Examples included sensor malfunctions and damaged instrumentation. TVA informed us that these issues would be resolved based on the priority level assigned in the instrument maintenance log, which tracks the status of identified issues.

All high-priority instrumentation maintenance issues we reviewed were resolved or had plans for resolution; however, some lower priority site conditions had not been addressed. Specifically, 10 of 36 low-priority issues were unresolved as of July 2025. If left unaddressed, instrumentation issues could impact engineering assessments at CCR storage facilities or prevent identification of future issues.

Recommendation – We recommend the SVP, GP&FS:

- Reinforce the importance of identifying existing issues during weekly inspections.

TVA Management's Comments – TVA management agreed with our recommendation and stated they would continue to emphasize the importance of identifying and documenting findings with inspection personnel. See the Appendix for TVA management's complete response.

Auditor's Response – We concur with management's ongoing actions.

- Complete corrective actions on the unresolved instrumentation maintenance issues identified in monthly instrumentation monitoring reports.

TVA Management's Comments – TVA management agreed with our recommendation and stated they will continue to actively assess, prioritize, and address items based on risk and operational impact. See the Appendix for TVA management's complete response.

Auditor's Response – We concur with management's ongoing actions.

REMEDICATION OF MINOR ISSUES IDENTIFIED DURING ANNUAL INSPECTIONS WAS NOT DOCUMENTED

All annual reports we reviewed observed minor site conditions such as erosion, vegetation, and animal burrows. Reports generally stated that these conditions were flagged in the field and reported to TVA for maintenance activities. TVA stated they remediate these conditions during routine maintenance activities at the sites; however, they did not document the resolution of these issues. Failure to document the resolution of issues identified in annual inspections increases the risk these conditions could go unaddressed.

Recommendation – We recommend the SVP, GP&FS:

- Consider documenting the resolution of minor issues identified in annual inspections.

TVA Management's Comments – TVA management agreed with our recommendation and stated they would consider the need for documentation based on severity. See the Appendix for TVA management's complete response.

Auditor's Response – We concur with management's planned actions.

ANNUAL INSPECTION REPORTS DID NOT DOCUMENT REVIEW OF WEEKLY INSPECTIONS

The CCR Rule requires that annual inspections include a review of previous inspection reports, including weekly, monthly, and annual inspections. We found that all annual inspection reports documented a review of previous monthly instrumentation monitoring reports and annual inspection reports but did not document a review of weekly inspection reports. Annual inspection reports create a historical record of conditions of CCR storage facilities to be used for future inspections and ensure issues identified are resolved. Missing review steps could impact the effectiveness of annual inspections.

Recommendation – We recommend the SVP, GP&FS:

- Take steps to validate that annual inspections include a review of weekly inspection reports.

TVA Management's Comments – TVA management agreed with our recommendation and stated they had conducted a review with their inspection partners to discuss the requirements. A review of the weekly inspections will be added to the Data Review section in the annual inspection report. See the Appendix for TVA management's complete response.

Auditor's Response – We concur with management's planned actions.

SOME INSPECTORS DID NOT HAVE REQUIRED TRAINING

We determined that 14 of 35 inspectors (employees and contractors) who performed inspections in our scope did not have current Dam Safety Awareness or CCR Awareness Training courses at the time they performed the inspection. In addition, TVA was unable to verify the training status of four of the contractors who performed annual inspections.

TVA Guidance Document, *Performance Monitoring of CCR Storage Facilities*, effective September 30, 2021, states that all personnel performing inspections shall be required to complete Dam Safety Awareness training on a biannual

basis, but that inspectors can be approved for comparable training in its place. According to TVA personnel, Dam Safety Awareness Training is the official training course offered to both employees and contractors, but TVA began offering a separate course in 2022, CCR Awareness Training. According to TVA, this course covers potential work hazards, structural safety, and ash exposure, as a result of ash pond closures.

TVA updated the *Performance Monitoring of CCR Storage Facilities* guidance document on December 31, 2024, to include CCR Awareness Training as an available training recommended for any personnel with regular access to CCR storage facilities. TVA personnel informed us they intend to replace Dam Safety Awareness with CCR Awareness as the required training course in the future. As a result, we concluded that either course satisfied the training requirement.

Personnel performing inspections without required training increases the risk that CCR storage facilities are not being monitored effectively.

Recommendation – We recommend the SVP, GP&FS:

- Facilitate the completion of required training for all personnel performing inspections.

TVA Management's Comments – TVA management agreed with our recommendation and stated they (1) reviewed training records, (2) confirmed completion of required training modules for all inspection personnel, and (3) were implementing a recurring training schedule. See the Appendix for TVA management's complete response.

Auditor's Response – We concur with management's ongoing actions.

- Document the training of contractors performing inspections of CCR Storage Facilities.

TVA Management's Comments – TVA management agreed with our recommendation and stated they will (1) require contractors to submit proof of training prior to performing inspections and (2) maintain training records in a centralized system accessible for audit and review. See the Appendix for TVA management's complete response.

Auditor's Response – We concur with management's planned actions.



Tennessee Valley Authority, 1101 Market Street, Chattanooga, Tennessee 37402

September 26, 2025

Greg Stinson,

RESPONSE TO DRAFT EVALUATION 2025-17544 – INSPECTION AND MAINTENANCE OF COAL COMBUSTION RESIDUAL STORAGE FACILITIES

Reference: Draft OIG Evaluation Dated August 28, 2025

Since the Kingston ash spill, TVA has emerged as an industry leader in the safe management of coal ash, establishing comprehensive standards for design, construction, operation, maintenance, inspections, and instrumentation monitoring; completing rigorous engineering evaluations of each facility; and taking action, where necessary, to modify spillways, build buttresses, and perform various other projects to improve the stability of CCR units. While not required by any regulatory program, TVA has led the industry in the innovation and installation of more than 16,000 automated sensors, providing real-time monitoring of stability conditions, an industry first. In parallel with these actions, TVA completed the transition from wet to dry methods for handling and storing CCR materials, resulting in the construction of new landfills for dry storage, closure several impoundments, and the pending closure of the remaining wet storage facilities.

Generation Projects & Fleet Services (GP&FS) appreciates the opportunity to review the referenced draft evaluation report. Our specific responses to comments are set forth below.

OIG Recommendation: Document the CCR storage facility instrumentation requiring monthly monitoring under the CCR Rule and confirm that instrumentation included in the monthly and annual reports is accurate.

TVA Response: TVA agrees with the recommendation. TVA employs a robust set of instrumentation to monitor the stability of CCR surface impoundments, as warranted, based on site specific conditions, engineering analysis, and operational status of each unit plus additional instruments that provide supplemental and corollary data sets. TVA will continue to comply with regulatory programs, while ensuring the long-term stability of CCR storage facilities and a robust set of documented data.

OIG Recommendation: Reinforce the importance of identifying existing issues during weekly inspections.

TVA Response: TVA agrees with the recommendation. TVA management recognizes the critical role that weekly inspections play in maintaining the integrity and safety of our operations. We will continue to emphasize the importance of identifying and documenting findings with inspection personnel.

OIG Recommendation: Complete corrective actions on the unresolved instrumentation maintenance issues identified in monthly instrumentation monitoring reports.

TVA Response: TVA agrees with the recommendation. TVA utilizes the instrument maintenance log, a best practice that is beyond what is required by the CCR Rule, to prioritize and track the resolution of instrument related items. TVA management acknowledges the importance of instrumentation

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maintenance and will continue to actively assess, prioritize, and address items on the list based on risk and operational impact.

OIG Recommendation: Consider documenting the resolution of minor issues identified in the annual inspections.

TVA Response: TVA agrees with the recommendation. TVA management acknowledges the importance of documenting the resolution of minor issues identified by inspections. Historically, due to being minor in nature, these items have been addressed quickly as part of routine maintenance. Going forward, engineering will consider the need for documentation based on severity.

OIG Recommendation: Take steps to validate the annual inspections include a review of weekly inspection reports.

TVA Response: TVA agrees with the recommendation and acknowledges the importance of ensuring that annual inspections incorporate a comprehensive review of all required documentation, including the weekly inspection reports. We have conducted a review with our inspection partners to discuss the requirements. A review of the weekly inspections will be added to the Data Review section in the annual inspection report.

OIG Recommendation: Facilitate the completion of required training for all personnel performing inspections and document the training of contractors performing inspections of CCR Storage Facilities.

TVA Response: TVA agrees with the recommendation and recognizes the importance of ensuring that all personnel conducting inspections are properly trained and capable of performing the required duties. We have:

- Reviewed current training records.
- Confirmed completion of required training modules for all inspection personnel.
- Implementing a recurring training schedule to ensure ongoing compliance and knowledge retention.

We are also updating our contractor management requirements to ensure that all training related to CCR Storage Facility inspections is properly documented, including:

- Requiring contractors to submit proof of training prior to performing inspections.
- Maintaining training records in a centralized system accessible for audit and review.

These steps will ensure that all individuals performing inspections—internal or external—are qualified and compliant with regulatory requirements.

We would like to thank the OIG evaluation team for their report and dedication assisting GP&FS with continuous improvement, which is a cornerstone of our culture and the way we do business. Although the OIG evaluation identified areas for improvement, we are encouraged that the thoroughness of the review yielded relatively minimal inconsistencies, none of which is related to a lack of performing maintenance, inspections, or the safe management of CCR. Your findings also reinforce the decisions TVA made to develop a CCR-specific program and efforts we have expended towards building an industry-leading program. Again, thank you for your thorough review and engagement with our team throughout the process.

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If you have further questions, please feel free to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Scott Turnbow", with a stylized flourish extending from the end.

Scott Turnbow, PhD
Vice President
Civil Projects, Equipment Support Services
GPFS

MST:HRC

Enclosure

cc (Enclosure):

Robert Bryan Williams
Greg Stinson
Tracey E. Hightower
Rebecca C Tolene

Patrick Kiser
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Kenneth H. Sims
OIG File No. 2025-17544