

CCR FUGITIVE DUST CONTROL PLAN

ALLEN FOSSIL PLANT COAL COMBUSTION PRODUCTS MEMPHIS, TENNESSEE

Prepared by:



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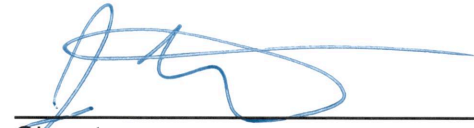
December 13, 2019 (Amended)

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CERTIFICATION

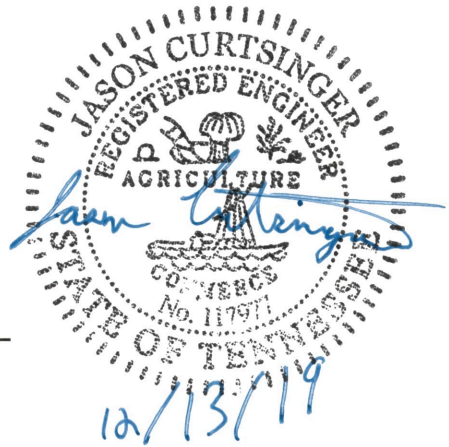
I certify that this plan meets the requirements of 40 CFR 257.80, Final Rule: Disposal of Coal Combustion Residuals from Electric Utilities.



Signature

December 13, 2019

Date



1.0 OVERVIEW

This CCR Fugitive Dust Control Plan (Plan) provides a program for minimizing fugitive dust events originating from day-to-day operations for Coal Combustion Residuals (CCR) management at the Allen Fossil Plant (ALF or Site) of the Tennessee Valley Authority (TVA), located in Memphis, Tennessee. This document provides measures to effectively minimize CCR from becoming airborne from CCR units, CCR piles, roads, and other CCR management activities. This plan has been developed in accordance with 40 CFR 257.80, Final Rule: Disposal of Coal Combustion Residuals from Electric Utilities.

1.1 Facility Description

ALF is a fossil-fueled, steam-electric generating plant with three coal-fired generating units that were operated by TVA until March 2018 when coal burning activities ceased. ALF no longer produces CCR. It is located 7.5 miles southwest of Memphis, Shelby County, Tennessee, on Plant Road. CCR materials produced by the power generating station are managed in the East Ash Disposal Area located within the eastern portion of the ALF reservation. Hauling of CCR materials to an offsite disposal facility ceased in September 2015.

2.0 FUGITIVE DUST CONTROL MEASURES

Fugitive dust will be controlled primarily through the conditioning and wetting of CCR material and associated CCR management activities as these methods have been historically effective and appropriate at the Site. In accordance with the ALF Title V Operating Permit, there will be no visible fugitive dust emissions leaving the Site's property boundary.

The Construction Contractor will manage dust suppression through the application of water using water trucks. The water truck is routinely operated anytime the weather conditions or work activity promote dusting concerns onsite. While on the East Ash Disposal Area, the water truck applies water to the interior haul roads and perimeter gravel road of the disposal unit.

The Construction Contractor will strictly manage the haul routes and traffic patterns to ensure that traffic is concentrated to common routes. Since CCR materials typically harden and stabilize with time after placement, it is anticipated that completed areas will not require continued water application to prevent fugitive dust dispersion. However, the Construction Contractor will monitor all surfaces and apply additional water as necessary to control fugitive dust across any exposed CCR material.

Other dust control measures that may be utilized in combination with the current measures, on an as needed basis include:

- Berms constructed as wind breaks
- Intermediate soil cover
- Chemical dust suppressants
- Sweeping of haul roads
- Limiting material drop heights
- Mobilization and use of additional water trucks

3.0 RECORD KEEPING

This Plan and the following associated documents will be placed in the Site's operating record once completed, and proper notification will be provided to the State Director. The following documents will also be made publically available on the Site's "CCR Rule Compliance Data and Information" website.

3.1 Citizen Input

Citizens can provide input and submit complaints/concerns relative to fugitive dust by calling 1-844-TVA-DUST (882-3878). Comments will be logged and submitted to TVA's Coal Combustion Product Management (CCPM) Group for review and response. Upon receipt, appropriate CCPM Management personnel will investigate the complaint/concern and implement any additional dust control measures required. Examples of additional

dust control measures which may be considered for implementation are described in Section 2.0. Upon completion, the results of the investigation and a description of any associated corrective measures employed by the site will be added to the log.

3.2 Annual CCR Fugitive Dust Control Report

A CCR Fugitive Dust Control Report will be prepared annually to provide a summary of dust control activities for the reporting year. The report will include a description of the actions taken to control CCR fugitive dust on Site, a record of all reported citizen complaints/concerns, and a summary of any necessary corrective measures taken.

4.0 ASSESSMENT OF CCR FUGITIVE DUST CONTROL PLAN

This Plan will be evaluated annually in conjunction with preparation of the annual CCR Fugitive Dust Control Report. Operating personnel at the Site have been instructed to record any evidence of fugitive dust events or deficiencies in the current fugitive dust control measures as well as report such issues to the TVA Field Supervisor. Evaluation of plan effectiveness will include a review of the Construction Contractor and TVA observation reports and any reported public complaints/concerns. Any necessary amendments or revisions required to rectify noted issues will be incorporated into the updated Plan.