

Plant: Allen Fossil Plant (ALF)
Date: December 15, 2017 (Placed in Operating Record)
Subject: Annual CCR Fugitive Dust Control Report
Reference: Title 40
Part 257: *Criteria for Classification of Solid Waste Disposal Facilities and Practices*
Subpart D: *Standards for the Disposal of Coal Combustion Residuals in Landfills and Surface Impoundments*
Operating Criteria: §257.80, *Air Criteria*

1. Introduction

Allen Fossil Plant (ALF) is a fossil-fueled, steam-electric generating plant operated by TVA that has three coal-fired generating units. It is located 7.5 miles southwest of Memphis, Shelby County, Tennessee, on Plant Road. CCR materials produced by the power generating station are processed and placed 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. An annual CCR fugitive dust control report, describing actions taken to control CCR fugitive dust and reporting citizen complaints and corrective action taken if any, must be filed annually pursuant to 40 C.F.R. § 257.80(c).

2. Fugitive Dust Control Measures

The current Fugitive Dust Control Plan states that the primary dust control measure will consist of conditioning and wetting of CCR material and associated CCR management activities. This application has historically been an effective measure. The plan also states that other dust control measures may be utilized in combination with the current measures with the following measures listed.

- 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

In accordance with the ALF Fugitive Dust Control Plan and since cessation of the offsite hauling activities, conditioning and wetting of the material in the disposal facility is performed. Additional measures have not been implemented.

3. Record of Citizen Complaints

The Fugitive Dust Control Plan allows for citizen input by providing a toll free number for citizens to contact and submit complaints and/or concerns relative to dust control. When complaints are submitted, TVA will assign the appropriate CCPM Management personnel to investigate the complaint/concern and implement any additional dust control measures needed.

Since the implementation of the Fugitive Dust Control Plan, no complaints and/or concerns have been submitted by the public.

4. Summary of Corrective Action

Corrective actions have not been implemented since dust control measures appear adequate and no complaints/concerns have been submitted.