

Plant: Allen Fossil Plant (ALF)
Date: December 6, 2024 (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

ALF ceased coal-burning activities in March 2018 and no longer produces coal combustion residuals (CCR). It is located 7.5 miles southwest of Memphis, Shelby County, Tennessee, on Plant Road. CCR materials are stored in the East Ash Disposal Area located within the eastern portion of the ALF reservation. 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 CCR 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. Conditioning and wetting CCR material has historically been an effective measure. The plan also states that other dust control measures may be utilized in combination, including the following measures.

- 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 CCR Fugitive Dust Control Plan, the conditioning and wetting of CCR material in the disposal facility is performed. Additional measures have not been implemented.

3. Record of Citizen Complaints

The CCR 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 Coal Combustion Product Management (CCPM) personnel to investigate the complaint/concern and implement any additional dust control measures needed.

No complaints and/or concerns have been submitted by the public during this reporting period.

4. Summary of Corrective Action

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