

Plant: Allen Fossil (ALF)
Date: August 19, 2016
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

The initial CCR Fugitive Dust Control Plan was submitted on November 19, 2015. As required by the CCR Rule (40 CFR 257.80), an annual report describing actions taken to control CCR fugitive dust, reporting citizen complaints, and corrective action taken must be submitted. The initial annual report must be completed no later than 14 months after placing the initial CCR fugitive dust control plan in the facility's operating record. Subsequently, annual reports will be submitted 12 months after the completion of the initial annual report.

1.1. Plant Description

Allen Fossil (ALF) is a fossil-fueled, steam-electric generating plant operated by TVA that has three coal-fired generating units and 20 oil or natural gas-fired combustion turbines. It is located 7.5 miles southwest of Memphis, Shelby County, Tennessee, on Plant Road. The Site itself is located within the eastern portion of ALF where the CCR materials produced by the power generating station are processed and stored until the products are transported to the Frank C. Pidgeon Industrial Park Landfill, an off-Site disposal facility.

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

Since the submission of the ALF Fugitive Dust Control Plan, the conditioning of the material in the dry disposal facility and the wetting of haul roads is utilized. 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 no complaints/concerns have been submitted.