

Plant: Bull Run Fossil Plant (BRF)
Date: December 10, 2021 (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

Bull Run Fossil Plant (BRF) is a fossil-fueled, steam-electric generating plant operated by TVA that has one coal-fired generating unit. It is located at 1265 Edgemoor Road in Clinton, Anderson County, Tennessee. All CCR materials generated by the power generating station are processed and placed into the Dry Fly Ash Stack Lateral Expansion which is a permitted landfill located within the northeastern portion of the BRF reservation. The Main Ash Pond, Fly Ash Stilling Pond 2C and the Sluice Channel are located in the southwestern portion of the BRF 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 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 BRF Fugitive Dust Control Plan, the following dust control measures are in place.

- Intermediate soil cover on exterior slopes.
- Sweeping of haul roads as needed.
- Mobilization and use of additional water trucks.

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 to the CCR Rule hotline by the public. In August, an email was sent to TVA public relations stating that a loose pile of CCR material was uncovered and that dust particles were observed. The email also included a photograph of the Dry Fly Ash Stack Lateral Expansion. Personnel from TVA and the Tennessee Department of Environment and Conservation (TDEC) Divisions of Air Pollution Control and Solid Waste conducted a site observation of the CCR units, confirmed proper BMPs and dust control measures were in place, and observed no indication of offsite fugitive dust from the CCR units.

4. Summary of Corrective Action

Additional corrective actions were not implemented due to the complaint since it was determined that existing dust control measures are adequate.