

CCR FUGITIVE DUST CONTROL PLAN

PARADISE FOSSIL PLANT COAL COMBUSTION PRODUCTS DRAKESBORO, KENTUCKY

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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.

A handwritten signature in black ink, appearing to be "Mark A. ...", written over a horizontal line.

Signature

4/17/19

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 Paradise Fossil Plant (PAF or Site) of the Tennessee Valley Authority (TVA), located in Drakesboro, Kentucky. 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

PAF is a fossil-fueled, steam-electric generating plant operated by TVA that has one coal-fired generating unit. Two of the units were idled in the spring of 2017. It is located northwest of Drakesboro, Muhlenberg County, Kentucky, on State Highway 176. CCR is managed in the Gypsum Disposal Area with two associated stilling ponds and the Peabody Ash Pond in the southern portion of the PAF reservation, Slag Ponds 2A and 2B with associated Stilling Pond 2C in the north portion of the PAF reservation, and the new CCR landfill located within the southeastern portion of the PAF reservation.

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 PAF 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 on the CCR Disposal Stacks, the new CCR landfill, and haul roads through the application of water using water trucks. The water filling station is located on the northeastern corner of the stilling pond.

CCR placed in lifts at the Stacks will be wetted to a moisture content that will prevent wind dispersal, but will not result in free liquids. The conditioned CCR will be compacted in accordance with the procedures outlined in the Site's Operations and Maintenance Manual.

CCR will be placed in controlled lifts at the new CCR landfill and will be wetted to a moisture content that will prevent wind dispersal, but will not result in free liquids (i.e., will be conditioned). Conditioning will be performed prior to loading, transport, and placement of the CCR in the landfill. This will also facilitate compaction. Only conditioned CCR will be placed in the landfill, as required by § 257.80(b)(2). Surfaces will be monitored and additional water applied as necessary to control fugitive dusting potential.

The Construction Contractor will strictly manage the haul routes and traffic patterns to ensure that traffic is concentrated to common routes and maintain berms to limit non-essential traffic access to the stack. The haul road to the new CCR landfill is paved and a truck wash is utilized to minimize dust emissions from CCR management activities. 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.