

Plant: Paradise Fossil Plant (PAF)
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*
Prepared by: Tennessee Valley Authority – Generation, Construction, Projects & Service

1. Introduction

PAF was a fossil-fueled, steam-electric generating plant that ceased operating its remaining coal-fired generating unit (Unit 3) in February 2020; Units 1 and 2 were retired in 2017. PAF is located northwest of Drakesboro, Muhlenberg County, Kentucky, on State Highway 176. CCR is no longer generated at PAF. The Site consists of the Gypsum Disposal Area with two associated stilling ponds, the Peabody Fly 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 reservation, and the New CCR Landfill (currently no CCR or any other waste materials have been placed in this facility) located to the South of the plant. 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 at the Gypsum Disposal Area and associated stilling ponds, which are currently under construction. The Peabody Ash Pond, Slag Ponds 2A & 2B have been capped with a geomembrane and covered with 2 feet of soil and vegetation. Stilling Pond 2C has been cleaned out and lined with a geomembrane and currently serves as a final storm water stilling pond therefore no dusting is possible at these facilities. As no CCR is being, or has ever been, placed in the New CCR Landfill, there is currently no fugitive dust to suppress at this CCR unit; consequently, no fugitive dust measures have been implemented at this CCR unit. In the event the New CCR Landfill were to start receiving CCR, the measure(s) set forth in this section will be implemented as appropriate. The plan also states that other dust control measures may be utilized with the following methods 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 PAF Fugitive Dust Control Plan, the following dust control measures are in place.

- Interim cover is maintained on the Gypsum Disposal Area slopes
- Conditioning and wetting of CCR materials in the disposal facilities
- Wetting of haul roads with water trucks as needed
- A speed limit of 15 miles per hour has been established on haul roads and traffic patterns have been managed to common routes to aid in minimizing fugitive dust

3. Record of Citizen Complaints

The Fugitive Dust Control Plan allows for public 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 required.

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.