

Plant: Shawnee Fossil Plant (SHF)
Date: December 14, 2018 (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

SHF is a fossil-fueled, steam-electric generating plant operated by TVA. It is located west of West Paducah, McCracken County, Kentucky, on Metropolis Lake Road. The coal combustion residuals (CCR) disposal area is located within the northwestern portion of the SHF reservation. CCR materials generated by the power generating station are processed and placed into a disposal complex that includes the Consolidated Waste Dry Stack and Ash Pond 2. 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 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 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 SHF CCR Fugitive Dust Control Plan, the following dust control measures are in place.

- Placing intermediate soil cover on the exterior slopes of the Consolidated Waste Dry Stack active stacking area.
- Conditioning and wetting of CCR materials placed in the disposal areas.
- Wetting of haul roads and active stacking areas 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 CCR 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.

One citizen complaint of fugitive emissions was received on November 9, 2018. The complaint claimed that material appearing to be consistent with burnt coal has been found on the citizen's property.

4. Summary of Corrective Action

TVA has been in communication with the citizen who filed the complaint. From these discussions, the citizen believes that the unknown material is emitted from the coal plant's stacks. Particulate matter emitted from the stack is regulated by the plant's Title V air permit, not the CCR Fugitive Dust Plan. Since the complaint is unrelated to fugitive dust emissions from CCR management and handling activities, corrective actions in accordance with the CCR Fugitive Dust Plan are not applicable or necessary. TVA has continued investigation into the complaint.

Corrective actions have not been implemented since dust control measures appear adequate.