PROPOSED/FINAL U.S. EPA RULE

COAL COMBUSTION RESIDUALS:

MAXIMIZE CAPACITY and TRANSITION YOUR EXISTING DISPOSAL SITE IN COMPLIANCE with FINAL RULE
Is This Your Ash Fill of the Past, Present, or Yet to Come?
Introduction

1. Rule Status
2. Recent Activity
3. Your Existing Site - Requirements
4. Transition Disposal/Operation Site
5. Maximize Existing Capacity
6. Recap and Q/A
1. Rule Status

LATEST INFORMATION:
2. Recent Activity – Request for Comments on:

- Regulatory Impact Analysis
- Large Scale Fills
- Impoundment Integrity
- Time Frames
- How Rule Relates to Overfills

Comments Were Due September 3, 2013
New Disposal Site Requirements
Groundwater Monitoring Well Installation and Sampling
Membrane Liner Installation
Membrane Liner Seaming and Testing
Leachate Collection Layer and Piping
Clay Cover Installation
Membrane Cover and Soil
Recent Installations
Transition Disposal/Operation Site

• Based on 20 Years of Transition with Municipal Waste Landfills............. What May Be Allowed and Required

• Likely Scenarios
Example

- Unique Site Operations and Rule Accounts for All Possibilities?
- Typical Wet and Dry Disposal Sites
- Maximize Existing Capacity
- Transition to New Rules
- Most Cost Effective Use of Property
3. Your Existing Site Potential Actions

- Groundwater Monitoring
- Impact?
- Actions?
- Capture?
- Containment?
- Treatment?
CCR SLURRY

WATER REUSE OR TREATMENT

SETTLED CCRs

LINED?

GROUNDWATER ELEVATION

WET/SLURRY PROCESSING OR DISPOSAL POND CURRENT OPERATION
Cross section with features mentioned above – Dry disposal

DRY CCRs

RAINFALL INFILTRATION

LINED?

GROUNDWATER ELEVATION

DRY DISPOSAL AREA
CURRENT OPERATION
4. **Transition: What We Know and Need to Know**

- Wet or Dry, You Need More Capacity for Disposal
- Plenty of Property – No?
- Does it meet the New Siting Requirements?
- Can it be Made to Meet Requirements?
- How Far Can You Afford to Transport CCRs?
- What Real Estate is the Most Valuable?
Dry continued operation
Dry closure
5. Maximize the Existing Site Capacity
Vertical and Horizontal Expansions

• Isolation/Separation

• How does this satisfy? Capped, Closed, Monitored

• Expand, Where?

• How Far can You Afford to Transport CCRs?
6. RECAP AND Q & A

1. Rule Status
2. Recent Activity
3. Existing Site Requirements
4. Transition/Phasing
5. Maximize Existing Capacity
   • Your System is Unique
   • Your Current State Regulations are Unique
Authors:

- Douglas J. Dahlberg PE
- James T. Perry PE

Sargent & Lundy LLC
55 East Monroe Street
Chicago, Illinois 60603