

Summary of features in the new TGD Guidelines for Beneficial Use of Coal Ash at Mine Sites

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BACKGROUND

- Chapter 290 final in December 2010
- This new document replaces two previous TGDs that have become obsolete since Ch 290 was published.
- Only applies to coal sites, not noncoal
- Addressed issues and questions that have been received since the regs were published.
- Reflects our knowledge about best practices that are most effective since the ash program was initiated in the 1980s.

DESCRIPTON OF CONTENTS

- Coal ash approval is a two-step process – certification and site approval
- Certification section: Describes how to apply for and maintain ash certification
- Clarification on suitable (but limited) additives to coal ash after it is produced
- Coal ash-like materials (ash from other fuels or doesn't meet Ch 290 ash definition) will require a waste General Permits, do not qualify for certification, but may still be subject to Ch 290. Ash stored for more than a year does not qualify as “coal ash” but is residual waste.
- Define what is “fuel” in “Alternate Fuels”
- Extensive section on Hydraulic Conductivity testing: Recommend a test method, what to submit to the Department and how often. Includes a sample template for what information should be submitted to DEP.
- What the operator should do when they exceed the Certification requirements in a ash sample. What it means to be “flagged” – relating to a chemical parameter exceedence
- Temporary Shutdown is an issue that was unanticipated when the certification program was designed. We recommend how operators should notify DEP of this situation so we can maintain a current status and make their transition back to regular status smooth.
- Clarification about how a source gets removed from the certification list and how it can get recertified.
- Types of beneficial use of coal ash: placement (which is filling pits and coal refuse pile reclamation), alkaline addition, low-permeability material and soil additive/substitute
- Reminder of where coal ash use is NOT appropriate, such as in special protection watersheds
- Explanation regarding appropriate ash use for mine land reclamation, alkaline addition, low-permeability material, and as soil substitute or additive, and the loading rates associated with use for soil.
- Detailed description of the process of site approval which is the second step after source approval.

- Section on Permit Applications and Revisions includes clarification on what actions constitute major vs minor permit revisions
- Instructions about when a Public Notice is necessary with regards to permit actions.
- Clarification on bonding at ash BU sites
- Recommendations for implementing water monitoring plans and directions on how to conduct proper sample analyses and submit sample results. This includes information regarding frequency of sampling during the life of the permit.
- Explanation of the lesser sample frequency exemption for ash monitoring on a “closed loop” site.
- Details on conducting Field Density Tests at ash sites
- Explanation of reports that are required to be submitted to the DEP yearly including annual ash volume.
- Discussion of the importance of Due Diligence by the site operator.
- Site Closure: Stage 3 reclamation bonds will be held for 10 years after planting. This is unique to coal ash sites due to the extra years of monitoring. So, a small portion of the bond is retained past the normal 5 years.
- Clarification regarding use of coal ash through reclamation contracts on Abandoned Mine Areas.