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Coal & Gas Seminar

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Coal Combustion Residuals Impoundment Closure Dewatering Wastewater Characterization and Treatment Evaluation

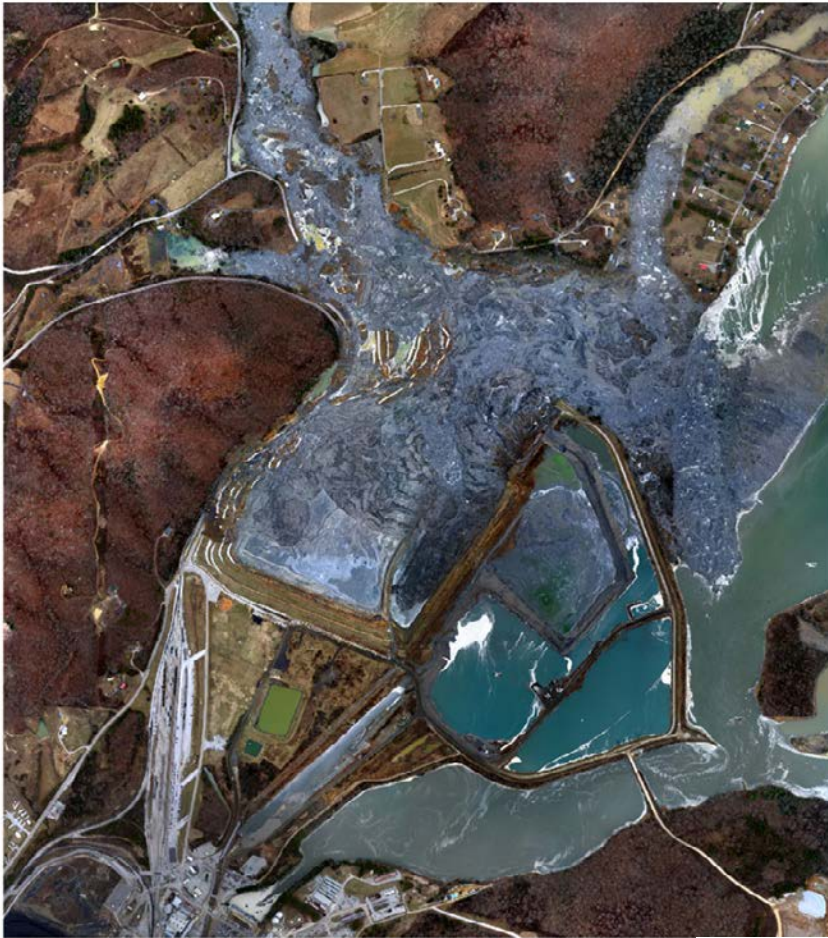
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Aerial Image Of Kingston Ash Slide 12/23/08



Coal Combustion Residuals (CCR) Rule Development Timeline

- ***June 2010***
 - Proposed Regulation Issued
- ***April 17, 2015***
 - Final Rule Published in the Federal Register
- ***October 2015***
 - Final Rule Effective Date
 - 6 months following Federal Register Publication

CCR Presentation Overview

- What are CCRs?
 - How have they been managed?
 - Future management under the CCR Rule
- CCR impoundment closure dewatering
 - Wastewater discharge/compliance implications
- Characterization of CCR closure wastewater discharges
 - Free water
 - Interstitial (ash entrained) water
- Summary guidance
 - Impoundment closure wastewater management

What Are CCRs

- Fuel byproducts produced from the combustion of coal (from the steam generation of electric power)
- *Fly Ash (light airborne particulate)*
- *Bottom Ash (heavy solids)*
- *FGD Solids (SO₂ air pollution control system solids)*



Historical/Current Management of CCRs

- *Wet sluiced ash to surface impoundments*
- *Dewatered material to landfills*
- *Beneficial reuse as product raw material*



Future Management of CCRs/ Impoundments Under the CCR Rule

- Existing/New CCR impoundments to comply with:
 - Sighting/location requirements
 - Operational and inspection requirements
 - Structural integrity requirements
 - Groundwater monitoring
 - Impoundment closure and post closure care requirements

CCR Final Rule/Compliance details (See Final Rule and Rule Summary Documents on EPA website:

<https://www.epa.gov/coalash/coal-ash-rule>

Future Management of CCRs/ Impoundments Under the CCR Rule

- Existing CCR impoundments non-compliant with CCR Rule:
 - Closure of existing impoundment
 - Construction of new CCR impoundment meeting requirements of CCR Rule *OR*
Convert wet ash sluicing to dry ash handling systems
 - Reroute non-ash handling plant wastewaters to alternate waste management system(s)





Characterization of Free and Interstitial Waters

- Physical/Conventional Chemical Parameters:
 - pH
 - Total Dissolved Solids (TDS)
 - Total Suspended Solids (TSS)
 - Oil & Grease
 - Turbidity

Characterization of Free and Interstitial Waters (Continued)

- Metals (Total and Dissolved):
 - Arsenic (As)
 - Selenium (Se)
 - Mercury (Hg)
 - Copper (Cu)
 - Iron (Fe)
- Nutrients:
 - Nitrate (NO_3)
 - Nitrite (NO_2)
 - Total Kjeldahl Nitrogen (TKN)
 - Phosphorus

Characterization of Free and Interstitial Waters (Continued)

- Collect samples at various depth in free water and accumulated ash
- Perform metals and TSS analyses on raw (unfiltered) samples and on serial filtrations of samples (i.e., 20 μ and 10 μ and 0.45 μ)
- Speciation of As and Se
- Whole Effluent Toxicity testing

Total Suspended Solids

	Permit Limits (mg/l)		Impoundment I-1 (mg/l)				Impoundment I-2 (mg/l)			
	<i>Monthly Avg.</i>	<i>Daily Max</i>	<i>I-1 (1ft)</i>	<i>I-1 (4ft)</i>	<i>I-1 (8ft)</i>	<i>I-2 (1ft)</i>	<i>I-2 (4ft)</i>	<i>I-2 (8ft)</i>		
Free Water TSS (mg/l)	23	75	2.5	2.5	2.5	2.5	2.5	2.5		
Interstitial Water TSS (mg/l)	23	75	2000	96	5	5700	680	66		

Arsenic

	Permit Limits (µg/l)		Impoundment I-1 (µg/l)				Impoundment I-2 (µg/l)			
Free Water As (µg/l)	<i>Monthly Avg.</i>	<i>Daily Max</i>	<i>I-1 (1ft)</i>	<i>I-1 (4ft)</i>	<i>I-1 (8ft)</i>		<i>I-2 (1ft)</i>	<i>I-2 (4ft)</i>	<i>I-2 (8ft)</i>	
	52.5	72.5	3.05	3.28	3.32		38		38.5	
Interstitial Water As (µg/l)	<i>Monthly Avg.</i>	<i>Daily Max</i>	<i>PZ-1</i>	<i>PZ-1 (20µ)</i>	<i>PZ-1 (10µ)</i>	<i>PZ-1 (0.45µ)</i>	<i>PZ-2</i>	<i>PZ-2 (20µ)</i>	<i>PZ-2 (10µ)</i>	<i>Z-1 (0.45µ)</i>
	10.5	14.5	656	386	375	378	71	10.7	1.61	

Selenium

	Permit Limits (µg/l)		Impoundment I-1 (µg/l)				Impoundment I-2 (µg/l)			
Free Water Se (µg/l)	<i>Monthly Avg.</i>	<i>Daily Max</i>	<i>I-1 (1ft)</i>	<i>I-1 (4ft)</i>	<i>I-1 (8ft)</i>		<i>I-2 (1ft)</i>	<i>I-2 (4ft)</i>	<i>I-2 (8ft)</i>	
	68	127.5	1.96	2.07	1.81		46.9		48.6	
Interstitial Water Se (µg/l)	<i>Monthly Avg.</i>	<i>Daily Max</i>	<i>PZ-1</i>	<i>PZ-1 (20µ)</i>	<i>PZ-1 (10µ)</i>	<i>PZ-1 (0.45µ)</i>	<i>PZ-2</i>	<i>PZ-2 (20µ)</i>	<i>PZ-2 (10µ)</i>	<i>Z-1 (0.45µ)</i>
	13.6	25.5	55.7	2.47	1.36	1.53	426	239	229	

Mercury

	Permit Limits (ng/l)		Impoundment I-1 (ng/l)				Impoundment I-2 (ng/l)			
Free Water Hg (ng/l)	Monthly Avg.	Daily Max	I-1 (1ft)	I-1 (4ft)	I-1 (8ft)		I-2 (1ft)	I-2 (4ft)	I-2 (8ft)	
	47	47	0.25	0.25	0.25		0.941	1.03	0.987	
Interstitial Water Hg (ng/l)	Monthly Avg.	Daily Max	PZ-1	PZ-1 (20 μ)	PZ-1 (10 μ)	PZ-1 (0.45 μ)	PZ-2	PZ-2 (20 μ)	PZ-2 (10 μ)	Z-1 (0.45 μ)
	47	47	40.6	16.5	3		76.7	33.2	12.9	

Nitrate-Nitrite

	Permit Limits (mg/l)		Impoundment I-1 (mg/l)				Impoundment I-2 (mg/l)			
	Monthly Avg.	Daily Max	I-1 (1ft)	I-1 (4ft)	I-1 (8ft)		I-2 (1ft)	I-2 (4ft)	I-2 (8ft)	
Free Water NO ₃ -NO ₂ (mg/l)	0.65	0.85	0.005	0.028	0.018		0.005		0.01	
Interstitial Water NO ₃ -NO ₂ (mg/l)	Monthly Avg.	Daily Max	PZ-1	PZ-1 (20μ)	PZ-1 (10μ)	PZ-1 (0.45μ)	PZ-2	PZ-2 (20μ)	PZ-2 (10μ)	Z-1 (0.45μ)
	0.13	0.17	0.005	0.01	0.023	0.016	0.005	0.333	0.317	

Phosphorus

	Permit Limits (mg/l)		Impoundment I-1 (mg/l)				Impoundment I-2 (mg/l)			
Free Water P (mg/l)	<i>Monthly Avg.</i>	<i>Daily Max</i>	<i>I-1 (1ft)</i>	<i>I-1 (4ft)</i>	<i>I-1 (8ft)</i>		<i>I-2 (1ft)</i>	<i>I-2 (4ft)</i>	<i>I-2 (8ft)</i>	
	Monitor Only		0.01	0.01	0.01		0.01	0.01	0.01	
Interstitial Water P (mg/l)	<i>Monthly Avg.</i>	<i>Daily Max</i>	<i>PZ-1</i>	<i>PZ-1 (20μ)</i>	<i>PZ-1 (10μ)</i>	<i>PZ-1 (0.45μ)</i>	<i>PZ-2</i>	<i>PZ-2 (20μ)</i>	<i>PZ-2 (10μ)</i>	<i>Z-1 (0.45μ)</i>
	Monitor Only		0.01	0.01	0.01	0.01	0.01	0.01	0.01	0.01

Free Water and Interstitial Water pH

- General observations:
 - Neutral to slightly alkaline across all project portfolio impoundments (meeting discharge requirement of pH = 6.0 to 9.0)
 - Exception site/interstitial water pH at 5.2 to 5.8 (requiring pH neutralization for discharge)

Wastewater Characterization Treatment Implications

- TSS Treatment of Free Water
 - Not required but implemented as contingency
- TSS Treatment of Interstitial Water
 - Required with likely chemical coagulation
- As and Se
 - Filtration (with/without chemical enhancement, in particulate form)
 - Where in dissolved anionic form
 - Biological (anaerobic) metal reduction
 - Zero Valent Iron media

Wastewater Characterization Treatment Implications (Continued)

- Mercury Treatment of Free Water/Interstitial Water
 - Not required for Free Water
 - Interstitial water/dewatering phase treatment by filtration
- Nitrate-Nitrite
 - Treatment not required
- Phosphorus
 - Treatment not required



Conclusions/Recommendations

- Engage environmental regulators early in the CCR impoundment closure planning process
- Prepare comprehensive free water and interstitial water characterizations including:
 - Analyses on serial filtrations (particularly interstitial water)
 - As and Se speciation
 - Whole Effluent Toxicity Testing
- Treatability testing

Questions

