

REINHOLD ENVIRONMENTAL[®]



2025 Reinhold/PCUG Round Table Presentation

Hosted by AEP and Buckeye Power

in The Hilton Columbus Polaris Hotel, Columbus, OH

on June 23-24, 2025

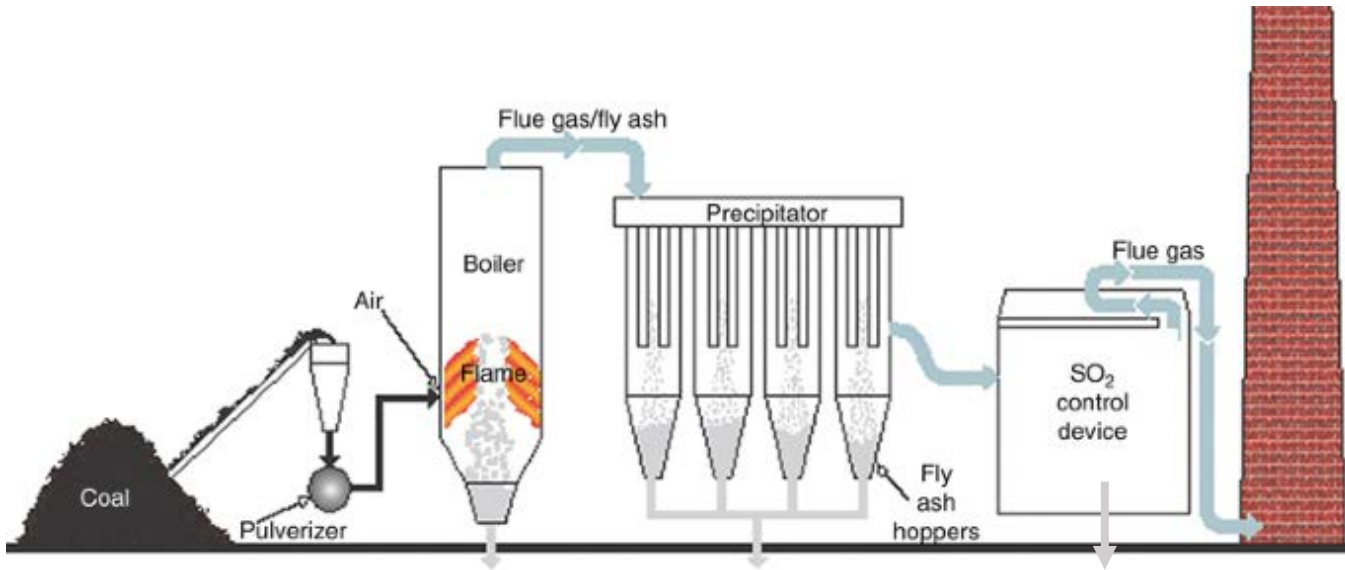
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LEGACY CCR RULE OVERVIEW

REINHOLD CONFERENCE

June 24, 2025

Coal Combustion Residuals (CCR)



Boiler Slag/Bottom Ash



Fly Ash



FGD materials/Gypsum



2015 CCR Rule

- CCR handling, storage and use **at active facilities**
- Purpose: Mitigate risk of ash storage releases and groundwater impacts
- Groundwater monitoring and remediation requirements
- Detailed design, operational, and closure requirements
- 30+ years of post-closure care requirements
- Self-administered rule with public operating record to demonstrate compliance

2024 Legacy CCR Rule

- Result of 2018 D.C. Circuit Court decision
- Expanded 2015 CCR Rule to inactive facilities with an inactive “legacy” surface impoundment
 - Contains both CCR and liquids on or after October 19, 2015
 - EPA provided additional detail what it means to “contain liquids”
- Also expanded the rule by adding “CCR Management Units” (CCRMU)
 - Previously closed ash ponds and landfills
 - Certain historic beneficial use projects
 - Required to index locations with > 1 ton of ash and regulates areas >1000 tons
- Requirements focus on closure and groundwater protection
- Initial compliance obligations began November 8, 2024
- Still self-administered rule with public operating record to demonstrate compliance

Applicability Review Process



Potential Locations of Legacy CCR Sites



2024 Legacy CCR Rule



Engineering Studies

Beginning 2024



Groundwater Monitoring

Beginning 2025



Site Security

Beginning 2024



Closure Standards

Written Plans - 2027/2028

Initiate Closure - 2028

Complete Closure - Mid-2030s



Weekly Inspections

Beginning 2024



Post-Closure Care

Begins Mid-2030s

Continues 30+ Years



Compliance Website

Beginning 2024



Next Steps

Phase 1

2024-2025

Baseline Studies & Site Characterization

- Initiate ecological, biological, and engineering studies of the site. (August-November)
- Perform a property survey and marking of boundaries. (September-November)
- Implement site security, including no trespassing signs, potential gates and fencing, and an increased site presence. (September-November)
- Initiate external communications and outreach. (October-November)
- Initiate weekly site inspections. (November)
- Establish a site-specific public website. (November)
- Begin clearing site vegetation. (November-March 2025)

Phase 2

2024-2027

Groundwater Monitoring

- Plan and design groundwater monitoring network. (2024-2025)
- Install monitoring wells and initiate monitoring. (2025)
- Initiate reporting of results to public website. (2027)

Phase 3

2027-Mid-2030s

Closure Activities

- Written closure plans for former ash pond sites. (November 2027)
- Written closure plans for other areas. (November 2028)
- Initiate closure of former ash pond sites. (May 2028)
- Initiate closure of other ash locations. (May 2029)
- Complete closure of ash locations (Mid-2030s)

Phase 4

Mid-2030s Onward

Post-Closure Care

- Maintain care of the site for at least 30 years.
- Continue groundwater monitoring and, if needed, remediation.
- Ongoing site maintenance and inspections.

Example 1



Example 2



Example 3

