Coal Ash Disposal and New Regulations

Presented by Gordon Criswell PPL Montana Colstrip Steam Electric Station

Colstrip Steam Electric Station

- 2276 Megawatts, 2nd largest coal fired power plant west of Mississippi River
- 350 employees
- 10 million tons of coal per year
- Wet scrubber 99.5% particulate control and 95% SO2 control
- Final disposal of ash/scrubber slurry in surface impoundment

Project Location



Coal Ash/Scrubber Slurry

- 85% ash
 - Silica oxide, aluminum oxide, calcium oxide
 - □ Trace amounts of metals (ppm/ppb range)

15% scrubber slurry

Calcium sulfate (gypsum), magnesium sulfate
 Boron

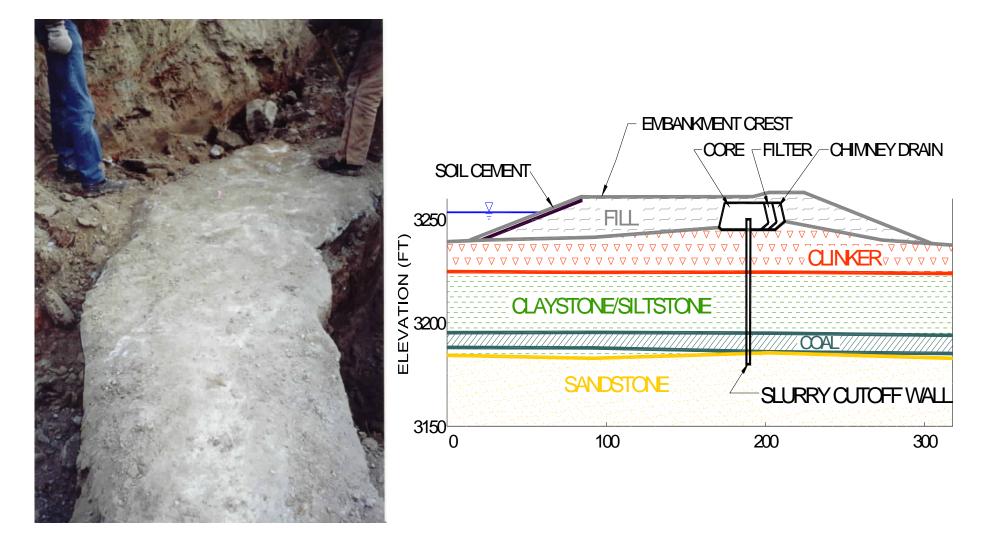
Not a hazardous waste

- TCLP tests typically non-detectable
- Mercury levels non-detectable
- Arsenic levels below Drinking Water Health Standards
 - Lower than Missouri & Yellowstone rivers
- Lead levels below Drinking Water Health Standards
 - Would normally meet Bottled Drinking Water Standard

Original Impoundment Design



Original Impoundment Design



Original Impoundment Design



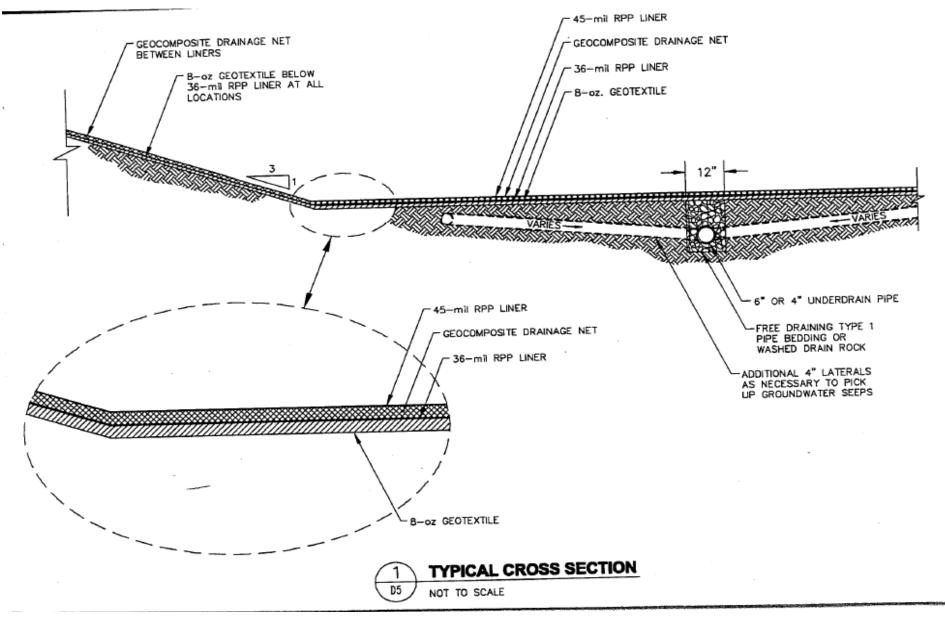
Current Disposal Process

Paste Disposal

- 100 tons per hour,
 65% solids,
 10.5" slump,
 (700,000 tons/year)
- 95% reduction in seepage potential
- Clearwater returned to plant for re-use



Recent Lining Practice



Recent Lining Practice



Recently Lined Ponds

- Since 2004, six ponds lined, ~130 acres
- Two ponds composite lined
 - At least 3' low permeability material
 - Leachate collection
 - □ 45 mil RFP liner
- Four ponds double lined
 - Under-liner leachate collection
 - 35-mil RFP lower liner
 - Between-liner leachate collection
 - 45-mil RFP upper liner
- Cost ~\$200,000 per acre

Most Recent Liner installation (2011)



Most Recent Liner Installation (2011)







Most Recent Liner Installation (2011)



EPA Proposed Regulations

- Subtitle C Treat as hazardous material
 - Potential elimination of beneficial re-use of ash
 - Need for landfills in states where hazardous waste landfills have not been permitted
 - Significant plant retrofits for handling material as hazardous
 - □ Up to 5 years to meet new impoundment requirements
 - Convert to dry handling
- Subtitle D Treat as non-hazardous material
 - Continued beneficial re-use of ash
 - □ Up to 5 years to meet new impoundment requirements
 - Convert to dry handling

Future Ash Disposal at Colstrip

- Expect final regulation or legislative action by end of this year
- Likely need to re-line all ash ponds with latest technology
 - Using current footprint with structurally stable material would be least environmental impact
- Likely need to convert to dry disposal systems
 - Result in material handling issues including dusting

