

## Document Log

From	To
John Sager/DC/USEPA/US	Dave Goss <dcgoss@aca-usa.org> Dave Gos
CC	BCC
Subject	
Re: FW: Some Questions	06/03/2005 09:33 AM

## Document Body

I haven't talked to Neil yet, but there are some potentially positive developments regarding Puerto Rico. The USEPA office in Puerto Rico is trying to set up a C2P2 workshop for government decision makers. Mid July is a possibility. This is not a done deal however.

**Dave Goss**  
<dcgoss@aca-usa.org>  
06/03/2005 08:29 AM

To John Sager/DC/USEPA/US@EPA  
cc  
Subj FW: Some Questions  
ect

John, this is that message I mentioned in my phone message.

Dave  
ACAA  
720-870-7897

**From:** Neil Watlington [mailto:Neil.Watlington@AES.com]  
**Sent:** Wednesday, June 01, 2005 1:58 PM  
**To:** Dave Goss  
**Subject:** RE: Some Questions

Dave- FYI- the Puerto Rico Department of Natural Resources has just sent us a letter where they reject that coal ash can be used beneficially and that it is to be considered a waste that must be properly disposed. The irony is that the Secretary of the DNR who signed the letter came from the EPA.

-----Original Message-----

**From:** Dave Goss [mailto:dcgoss@aca-usa.org]

**Sent:** Wednesday, June 01, 2005 5:43 AM

**To:** Neil Watlington

**Subject:** RE: Some Questions

Neil,

Thank you very much for this information. I'll keep you posted.

Dave

ACAA

720-870-7897

**From:** Neil Watlington [mailto:Neil.Watlington@AES.com]

**Sent:** Tuesday, May 31, 2005 12:29 PM

**To:** Dave Goss

**Subject:** RE: Some Questions

Sorry for getting back to you so late, but I was out of the country. Please see my answers below.

-----Original Message-----

**From:** Dave Goss [mailto:dcgoss@aca-usa.org]

**Sent:** Monday, May 23, 2005 11:30 AM

**To:** Neil Watlington

**Subject:** Some Questions

Neil,

Today I had a call from EPA Region 2, Charles Harewood who asked me a number of questions about your planned applications.

He mentioned that there is a perception that when the Guyama facility was permitted, there was a commitment not to dispose of any material on-island. Is this correct? He then mentioned that to be sure any planned applications are not disposal, he would like some additional details about the uses you have planned for the material. For example,

We made a contractual commitment that our CCP's would be beneficially used on the island, or shipped out. Throughout all of the permitting process we made it clear that our intention would be to find beneficial uses for our CCP's on the island.

Can you explain the projects or applications that you envision the ash to be used for?

The Manufactured Aggregate (fly and bed ash 80:20 mixed with water) is mostly used as a fill material in construction. We are currently building several rural road construction projects using the material as a base. The fly and bed ash are currently being used for liquid waste stabilization an application that is growing. We expect additional applications in construction to develop soon, such as filler material for asphalt, and extenders for grout and paint. We would like to expand into agriculture as a lime substitute.

What processing, if any, is needed to make the material acceptable?  
Very little on the current applications. The University of Puerto Rico is initiating a research and development program on our materials.

Are engineering guidance documents (ASTM, AASHTO, etc.) going to be used for these applications?

We have used the standards where applicable. For example, the manufactured aggregate easily complies with AASHTO A-2-4 standards for use as a fill material which is the general standard in Puerto Rico for general fill purposes. We also know that the material does not qualify as a Class F fly ash and as such we let people know that it doesn't work well as a cement substitute in concrete.

Can you describe the projects that you have lined up in such a manner as it is clear this is not disposal by another means?

If somebody requests the legitimate use of the material and doesn't charge to take it we believe the material is being beneficially used. For example, using the material as alternative daily cover could be a guise for "disposal". However, if the landfill doesn't charge a tipping fee and uses the CCP's in substitution of natural earth we believe it is being beneficially used. The same goes for large fill projects, etc. Our projects right now consist mainly of rural road base, liquid waste stabilization, and large fill.

What limitations are there to using the material? Are LOI or chemical composition issues part of deciding the end uses?

Any limitations would be of a technical (engineering) not environmental nature (except for proper fugitive dust control). All of the analyses that the PR Environmental Quality Board, St. Croix EQB and even the Dom. Rep EQB, including our own, demonstrate that the material is in compliance with a Full RCRA. Comparison studies show that our materials are similar in chemical composition to Portland Cement.

If you can give me some of these answers, I think Charles will be able to better leverage C2P2 to help with the government agencies in Puerto Rico.

I sent a lot of our technical information and permits to Eduardo Gonzalez at EPA who told me he would be forwarding them on to his mainland colleagues.

Thanks, Thank you for your help.

Dave  
ACAA  
720-870-7897

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