

From: Missimer, Skip [Skip.Missimer@glatfelter.com]
Sent: Thursday, December 17, 2009 3:24 PM
To: EP, RegComments
Subject: Comments of P. H. Glatfelter on Proposed Rulemaking 25 PA Code Chs. 287 & 290 Beneficial Use of Coal Ash
Attachments: Glatfelter Comments on Proposed Rulemaking 25 PA Code Chs. 287 & 290 Beneficial Use of Coal Ash.pdf; One page Summary Glatfelter Comments on Proposed Rulemaking 25 PA Code Chs. 287 & 290 Beneficial Use of Coal Ash.pdf

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Environmental Quality Board:

Please find attached two documents.

- 1) A letter detailing the comments of P. H. Glatfelter on the Proposed Rulemaking 25 PA Code Chs. 287 & 290 Beneficial Use of Coal Ash as published in the Pennsylvania Bulletin on November 7, 2009.
- 2) A one page summary of P. H. Glatfelter's comments for inclusion in the agenda packet distributed to each member of the Board prior to the meeting in which the final-form regulation will be considered.

Please acknowledge receipt of this transmission and the two attachments to the return name and e-mail address below.

Thanks you.

C. L. Missimer

<<Glatfelter Comments on Proposed Rulemaking 25 PA Code Chs. 287 & 290 Beneficial Use of Coal Ash.pdf>>

<<One page Summary Glatfelter Comments on Proposed Rulemaking 25 PA Code Chs. 287 & 290 Beneficial Use of Coal Ash.pdf>>

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December 17, 2009

Environmental Quality Board
P. O. Box 8477
Harrisburg, PA 17105-8477

Re: Comments on Proposed Rulemaking 25 PA Code Chs. 287 and 290 Beneficial
Use of Coal Ash - Pennsylvania Bulletin November 7, 2009

Dear Environmental Quality Board Members:

The P. H. Glatfelter Company (Glatfelter) is a global manufacturer of high quality technical and specialty papers with manufacturing operations in the United States, Germany, France, Great Britain and the Philippines. Our US operations are based in Chillicothe, Ohio and Spring Grove, Pennsylvania. The Spring Grove mill is a bleached papergrade kraft pulp and paper mill. Renewable biomass energy supplies most of the energy for the generation of steam and electricity at the Spring Grove mill. The remainder of the energy comes from Pennsylvania-mined coal. Coal ash generated in our industrial power boilers is presently permitted for a number of beneficial uses particularly coal mine reclamation. Accordingly, Glatfelter has an immediate interest in these proposed regulations.

Bituminous coal has been a critical component of our Commonwealth's and our nation's economy for close to 200 years. This abundant natural resource fueled the industrial revolution in Pennsylvania and the United States in the 1800s and continues to provide a significant fraction of the energy that powers our remaining industrial base and lights our homes. For the foreseeable future coal will continue to play a critical role in meeting our nation's energy needs until cleaner and greener technologies become economically available.

It is well documented that historical mining practices were not sustainable and damaged the environment. Today, however, coal is mined in an environmentally responsible manner and coal ash, the primary waste from the combustion of coal, is likewise handled in an environmentally responsible manner.

In the last thirty years, coal users have developed numerous beneficial uses for coal ash instead of simply disposing of it in landfills. Coal ash is now considered a valuable commodity that can be used for numerous purposes including coal mine reclamation, soil amendment, concrete production, antiskid materials, and pipe bedding and drainage materials, just to name a few. The proposed rulemaking regarding the beneficial use of

coal ash is an important step in maintaining the use of coal and the beneficial and economical use of coal ash.

Please find immediately below our specific comment on the proposed regulations and our suggestion for improving them.

The definition of coal ash is too restrictive and should be expanded.

The definition of coal ash in Section 287.1 references only ash that results from the combustion of coal and fails to consider that coal is often co-fired with other materials particularly biomass and may, therefore, contain ash from materials other than coal. Likewise, coal ash may contain other materials, such as limestone, that were added to the coal to reduce the emission of air pollutants

National environmental and energy policies as well as Pennsylvania's Alternative Energy Portfolio Standard recognize the environmental, economic and national security benefits from generating more electricity from renewable and domestic sources of energy such as wind, solar and biomass. Glatfelter and many electric utilities are now co-firing coal and biomass in the form of wood or agricultural wastes to generate electricity that is more sustainable than electric generated only from coal.

What happens at Glatfelter's Spring Grove mill is illustrative of similar situations. Wood is received on a daily basis where it is debarked and chipped for pulping. Waste wood is produced at various points of the pulping process then burned in one or more of our power boilers. The burning of wood waste in our power boilers offers various environmental benefits. It serves as a supplemental fuel to coal which results in a decrease in sulfur dioxide emissions and various hazardous air emissions. In addition, waste wood that is directed to a boiler serves as a fuel to produce steam, rather than being directed to a landfill. Wood is a renewable energy source. All wood used at the Glatfelter Spring Grove mill comes from sustainable forests and is considered carbon neutral from a greenhouse gas emissions perspective.

The ash from the co-firing of coal and wood waste is not explicitly covered under the proposed beneficial use regulations, but it should be in order to encourage the burning of more biomass. The addition of wood ash to coal ash does materially change the nature of the coal ash. With respect to composition, the concentrations of trace metals in wood ash are very low and not highly extractable. Therefore, coal ash that is mixed with wood ash will have lower concentrations of trace metals compared to pure coal ash.

The addition of wood ash to coal ash does not change the physical characteristics of coal ash. Accordingly, mine reclamation can be successfully carried out using ash comprised of a coal/wood ash mixture in the same manner that coal ash is used.

Any material that is added to coal to reduce air emissions and/or increase energy efficiency helps move our nation towards greater energy independence and can provide cleaner emissions. This too should be encouraged. With respect to coal ash disposal and

use, the primary concern should be its chemical composition rather than whether it is composed solely of coal ash. As long as the ash meets the toxicity and stability properties established by the Department, its beneficial use should be allowed and encouraged.

Accordingly, Glatfelter suggests that the definition of "coal ash" in Section 287.1 be expanded to read as follows:

Coal ash – Fly ash, bottom ash or boiler slag resulting from the combustion of coal *or a mixture of coal and biomass*, that is or has been beneficially used, reused or reclaimed for a commercial, industrial or governmental purpose. *Materials added to coal to reduce pollution during the combustion process are also considered coal ash.* The term includes the materials that are stored, transported or sold for beneficial use, reuse or reclamation.

As the United States seeks ever more opportunities to increase the use of renewable energy sources, the use of wood and other biofuels will play an important role. It is essential that the Department's standards and programs align with each other to effectively attain the goals of clean energy and greater energy independence. It is essential that the definition of coal ash not conflict with the renewable energy goals established by the Commonwealth of Pennsylvania.

Thank you for your attention to this matter.

Sincerely,



Carroll L. Missimer, Ph.D.

Global Director – Environmental Affairs

One-page Summary of P. H. Glatfelter's Comments on Proposed Rulemaking
25 PA Code Chs. 287 and 290 Beneficial Use of Coal Ash -
Pennsylvania Bulletin November 7, 2009

The P. H. Glatfelter Company's (Glatfelter) Spring Grove, Pennsylvania mill is a bleached papergrade kraft pulp and paper mill. Renewable biomass energy supplies most of the energy for the generation of steam and electricity at the Spring Grove mill. The remainder of the energy comes from Pennsylvania-mined coal. Coal ash generated in our industrial power boilers is presently permitted for a number of beneficial uses particularly coal mine reclamation. Accordingly, Glatfelter has an immediate interest in these proposed regulations.

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