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PROJECT CONSIDERATIONS FOR NEW COAL ASH LANDFILLS

PRESENTED AT: 2013 WORLD OF COAL ASH CONFERENCE

April 24, 2013



PRESENTATION OVERVIEW

- Introductions
- Regulatory Drivers
- Project Considerations
- Relevant Project





INTRODUCTIONS

- Sean Rome Vice President, Energy Waste Program
 - Responsible for Tetra Tech's Energy Waste Program
 - In 2012, managed >100 related projects at ~\$300M
 - Participates on numerous technical advisory panels for EPRI, USWAG, etc.
- Mohamad Al-Hawaree, P.E., Assistant Vice President Engineering
 - In 2012, Managed and Designed >150 related projects
 - Serves on numerous technical advisory panels
 - Serves as Technical Expert for liner system design, specifically FGD Ash and Gypsum stacks, for Tetra Tech



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REGULATORY DRIVERS



REGULATORY DRIVERS

Federal Regulatory Foundations for Waste Disposal:

- Solid Waste Disposal Act (SWDA) in 1965
- Resource Conservation and Recovery Act (RCRA) in 1976
- Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) in 1980



PENDING REGULATORY DRIVERS

Proposed Federal Regulations - *The Game Changers*:

- USEPA CCR Rule*
- HR 2273 / 3409
- SB 1571 / 3512*

*Active Drivers



HIGHLIGHTS OF SUBTITLE D OPTION

- Effective Date ≈ 6 months
- Enforcements by State
- Self-Implementing Corrective Actions
- No Permit Required
- No Liner Required for Existing Landfills
- Groundwater Monitoring Requirements
- Liner and Groundwater Monitoring Requirements for New Landfills
- Closure and Post-Closure Care Requirements



HIGHLIGHTS OF SUBTITLE C OPTION

- Effective Date \geq 1 year
- State and Federal Enforcements
- Corrective Actions Monitored by States and EPA
- Requires Permits Issued by States
- No Liner Requirements for Existing Landfills
- Groundwater Monitoring Requirements
- Liner and Groundwater Monitoring Requirements for New Landfills
- Closure and Post-Closure Care Requirements



ANTICIPATED PROVISIONS OF FEDERAL CCR RULE

- More Stringent Requirements on Design of Bottom Liner and Leachate Collection Systems.
- Tighter Provisions on Groundwater Quality Monitoring.
- More Extensive Material Characterization and Leaching Studies.



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PROJECT CONSIDERATIONS



PROJECT CONSIDERATIONS

- Location Restrictions
- Design and Operating Criteria
- Groundwater and Gas Monitoring Requirements
- Corrective Action Requirements
- Financial Assurance Requirements
- Closure and Post-Closure Care Requirements



DESIGN REQUIREMENTS: BOTTOM LINER

Subtitle C

- Double Liner System with Two Components
 - Top Component: Geomembrane Liner
 - Bottom Component: Geomembrane Liner on Top of 3 Feet of Compacted Soil Liner with a Hydraulic Conductivity of ≤ 1x10⁻ ⁷ cm/sec
- Leachate Collection System above Top
 Component
- Leak Detection System between components

Subtitle D

- Composite Liner System
 - Geomembrane Liner
 - 2 Feet of Compacted Soil Liner with a Hydraulic Conductivity of $\leq 1 \times 10^{-7}$ cm/sec
- Leachate Collection System
- ♦ \leq 12 Inches of Leachate Head on Top of
- Bottom Liner System



COMPOSITE LINER SYSTEM



DOUBLE GEOMEMBRANE LINER SYSTEM





DESIGN REQUIREMENTS: FINAL COVER

Subtitle C

24 Inches of a Topsoil and Drainage
 Layer

✤ 24 Inches of a Compacted Soil Liner with a Hydraulic Conductivity of \leq 1x10⁻⁷ cm/sec

Geomembrane Liner on top

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Subtitle D

- Infiltration Barrier:
 - 18 Inches of Soils with a Hydraulic Conductivity of ≤ 1x10⁻⁵ cm/sec

Erosion Layer:

• 6 inches of Soils to Support Vegetation Cover



INVERTED COMPOSITE LINER SYSTEM FOR PHOSPHOGYPSUM STACKS





DIFFERENCES BETWEEN COAL ASH AND MSW LANDFILLS

Coal Ash Landfill

- Relatively homogenous/inert industrial waste stream
- Waste is not biodegradable; no landfill gas; minimal settlement
- Waste is sometimes stabilized or conditioned
- No daily or intermediate cover required
- Does not attract vectors
- Dense waste compacted with vibratory compactors
- Leachate contains primarily metals and inorganics

MSW Landfill

- Heterogeneous residential/ commercial waste stream
- Waste decomposes, settles and produces landfill gas.
- Waste is usually landfilled as received
- Requires daily and intermediate soil or alternative cover
- ✤ Attracts birds, rodents, etc.
- Compaction with specialized steelwheeled compactors
- Leachate contains a wide variety of potential contaminants, including organics

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CASE HISTORY:

PERMIT, DESIGN AND CONSTRUCTION SUBTITLE D ASH LANDFILL CONFIDENTIAL UTILITY CLIENT



PROJECT OVERVIEW

- Design/Permit:
 - 90-acre RCRA Subtitle D,
 - Double lined, 3 cell landfill with leachate collection system (LCS) with leak detection system (LDS);
 - 22-acre stormwater pond.
- Construct:
 - Cell 1 (~30 acres),
 - 22-acre SW Pond and associated MEP Systems and;
 - 2-acre decant cell





PROJECT OBJECTIVES

- Expedite and Satisfy Regulatory Permitting Requirements
- Optimize Air Space (\$\$\$)
- Meet Compressed Permitting and Construction Schedules
- Conduct all work safely
- Minimum or No Impact to Plant Operations
- High Quality End Product
- Protect Client's Investment without "Cutting Corners"
- No Change Orders (Firm Fixed Price)









CONSTRUCTION SCOPE OF SERVICES

- Clear and Grub (including burning of vegetation onsite)
- Top soil stripping/stockpiling 40,000cy
- Stormwater Pond (22 acres) earthwork cut 400,000cy
- Pond drainage structures with 36" HDPE double-barrel pipes
- Landfill expansion (30 acres) earthwork and culverts Fill 400,000cy
- Clay placement and compaction 24,500cy
- Piggyback tie-in at existing slope
- Leachate collection system (including laterals, sumps, collection, riser, and sumps)
- Top soil and permanent erosion



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CONSTRUCTION HIGHLIGHTS

- Cut from Pond and fill/compact cell subgrade
- Protective sand layer (24") landfill cell
- Leachate pads and forcemain (including cleanout and video inspection) 6,000lf
- Decanting/General storage cell (2 acres) earthwork
- Construct and fine grade perimeter berms
- Place, grade, compact, and finish clay subbase
- Install 6, 000 If force main
- Substantial completion November 2012
- Total SAFE hours worked onsite incident free >130,000 hrs (avg. crew 24 workers/over 9 months)
- Successful Work led to new projects (D/B 10 Acre Ash Pond and 2,800lf S/B Cutoff Wall.



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PROJECT TIMELINE



NOTICE TO PROCEED: MAY 2011



FIELD EXPLORATION: MAY – JULY 2011





Basic Engineering Design: June to December 2011



Detailed Engineering Design: August to December 2011



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REGULATORY APPROVAL: JANUARY 2012



Florida Department of Environmental Protection Central District 3319 Maguire Boulevard, Suite 232 Orlando, Florida 32803-3767

Governor Jennifer Carroll Lt. Governor Herschel T. Vinyard Jr.

Rick Scott

Environmental Resource Permitting Notice of Post Certification Compliance Authorized Entity: Orlando Utilities Commission (OUC) Siting No: PA81-14 Environmental Resource File No: 48-0308758-001

Approval Date: January 20, 2012

PROJECT LOCATION

The activities subject to this notice of post certification compliance are located at OUC Stanton Energy Center, in Orlando, 32831, in Section 13, Township 23 South, Range 31 East in Orange County.

As staff to the Board of Trustees, the Department has reviewed documents provided and has determined the activity is not on submerged lands owned by the State of Florida. Therefore, your project is not subject to the requirements of Chapter 253, Florida Statutes.

HISTORY

The Orlando Utilities Commission is certified pursuant to the Power Plant Siting Act (PPSA), ss. 403,501-518. Florida Statutes (F.S.). The original OUC site certification included the operation of a 930 MW facility consisting of two coal-fired Units No. 1 and No. 2, and ancillary equipment, the construction and operation of a 633 MW gas-fired combined cycle facility known as Combined Cycle Unit A, and the construction and operation of a 300 MW duel fueled (natural/gas/No.2 fuel oil) Combined Cycle unit known as Unit B.

On November 3, 2011, the Florida Department of Environmental Protection (DEP) Siting Coordination Office (Siting) and DEP Central District (CD) Submerged Lands and Environmental Resource Permitting (SLERP) section received a post-certification submittal from OUC in accordance with Section V.G. of the Conditions of Certification to construct and operate a stormwater management system to provide treatment and attenuation for the proposed lateral expansion of the OUC Stanton Energy Center combustion waste landfill. Stormwater runoff from proposed project will be treated and attenuated by a wet detention system. No impacts to wetlands or surface waters are authorized by this approval.

Pursuant to PPSA Rule 62-17.191, F.A.C., within 90 days after complete information is submitted for post-certification review, the Department shall give written notification to the licensee of its assessment of whether there is reasonable assurance of compliance with the conditions of certification. OUC is required to comply with the conditions of certification and applicable rules and regulations of the Department pursuant to Condition of Certification Section VII.

Authorized Entity: OUC Siting No.: PA81-14 Page 1 of 6 Construction Phase Expiration : January 20, 2017 ERP Authorization No: 48-0308758-001

CONSTRUCTION START DATE: JANUARY 2012



















