A TECHNICAL REVIEW OF THE FINAL REPORT OF THE NATIONAL ACADEMY OF SCIENCES "MANAGING COAL COMBUSTION RESIDUES IN MINES"

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ABSTRACT

The National Academy of Sciences released its final report "Managing Coal Combustion Residues (CCRs) in Mines." Findings stated that putting coal ash back into mines for reclamation is a viable option for disposal, as long as precautions are taken to protect the environment and public health. It acknowledged that CCRs could serve a useful purpose in mine reclamation, lessen the need for new landfills, and potentially neutralize acid mine drainage. It recommends development of enforceable Federal standards that give the States authority to permit the use of CCRs at mines but allows them to adopt requirements for local conditions.

The author is in agreement with the NAS findings that support: (1) the use of these materials in mine reclamation; (2) the need for specific Federal regulations under SMCRA that spells out the minimum permitting, bonding, and environmental performance standard requirements when they are placed on active coal mines; (3) the research priorities to specifically address the hydrogeologic fate of CCBs and any leachate generated in relation to public health and environmental quality; and (4) to develop mining appropriate leachate tests. A limitation of the report is its inability to: (1) acknowledge the profound differences between regulatory environments that control placement of CCBs at mines; (2) evaluate available ground water monitoring data and scientific research within the context of the applicable regulatory environments; and (3) acknowledge the volumes of scientific studies and State regulatory data that shows no degradation of water quality due to placement of CCBs at SMCRA mines for the last 29 years.

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