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Standard Guide for Harvesting Coal Combustion Products Stored in Active and Inactive Storage Areas for Beneficial Use¹

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1. Scope

1.1 This guide provides a framework to address critical aspects related to the *harvesting* of *CCPs* placed in *active* (operational) and *inactive* (closed or no longer receiving *CCPs*) *storage areas*. These storage areas may be used for wet or dry material, and may be located at *active* or *inactive facilities* (that is, coal-fired electric utilities or independent power producers that are currently generating electricity or have ceased to do so, respectively). Also, *CCPs* may be harvested from *active* or *inactive storage areas* located on-site or off-site of the *facility*.

1.2 This guide does not include information on how to determine what *storage areas* or facilities, or both should be selected for potential *harvesting* of *CCPs*, as each entity may approach a *harvesting* program in accordance with their own *harvesting* pursuits and regulatory requirements. In addition, it does not include information on how an energy company or other interested parties should evaluate inventories to determine the order of their *storage areas* for potential *harvesting* including consideration of risk, performance and cost. This guide is intended to be used to evaluate the potential *harvesting* of the *storage areas* once the *storage areas* are selected for evaluation. and ards the harvesting/standards/sist/afbbc4ce

1.3 This guide is comprised of the following sections: Scope, Section 1; Referenced Documents, Section 2; Terminology, Section 3; Significance and Use, Section 4; Project Planning and Scoping, Section 5: Background Review of *CCP Storage Areas*, Section 6; Detailed Characterization of *CCP Storage Areas*, Section 7; *Harvesting* Planning and Scoping of *CCP Storage Areas*, Section 8; *Harvesting* Detailed Design and Approval (as applicable) of *CCP Storage Areas*, Section 9; and *Harvesting* Implementation of *CCP Storage Areas*, Section 10. Not all information within this guide will be necessary for each *harvesting* project, and the user should determine the applicability of each section.

1.3.1 Section 1, Scope, includes information related to contents of this guide, as well as what is not included in this guide.

1.3.2 Section 2, Referenced Documents, includes published documents referenced within this guide.

1.3.3 Section 3, Terminology, includes definitions for terms as they relate to this guide.

1.3.4 Section 4, Significance and Use, describes the *beneficial use of CCPs* stored within *active* and *inactive storage areas*, including each *CCP* potential beneficial use; the context of the guide and its use; the professional judgment that is appropriate for use of the guide; and the inherent uncertainty with the processes described within the guide.

1.3.5 Section 5, Project Planning and Scoping, describes the steps needed prior to implementing this guide, including: establishing a *project team*; determining what *storage areas* within the *facility* should be evaluated for potential *harvesting* of *CCPs*; determining the potential materials to be harvested; compiling existing land use, environmental compliance, geologic/hydrogeologic, topographic, design and construction information; estimating potential project costs and project schedule with contingencies (if feasible); and identifying factors that may impact the ability to harvest the *CCPs*.

1.3.6 Section 6, Site Background Review of *CCP Storage Areas*, describes the steps for evaluating the attributes of *storage areas* at the *facility* relative to *harvestingCCPs*.

1.3.7 Section 7, Detailed Characterization of *CCP Storage Areas*, describes the steps for developing and implementing the *CCP* characterization sampling and analysis plan that will evaluate the chemical and physical characteristics of the *CCPs* within the *storage areas*, and determining if amendments to the *CCPs* will be needed for beneficial use.

1.3.8 Section 8, *Harvesting* Planning and Scoping of *CCP Storage Areas*, describes the steps necessary to evaluate the approval status of the *storage areas* and develop a conceptual *harvesting* strategy and approval approach for the project. Considerations are given for both *active* and *inactive storage areas*.

1.3.9 Section 9, *Harvesting* Detailed Design and Approval (as applicable) of *CCP Storage Areas*, describes the steps needed to prepare the detailed design and approval documents (as applicable) for the *CCP storage area harvesting* and receive the appropriate approval (as applicable).

1.3.10 Section 10, *Harvesting* Implementation of *CCP Storage Areas*, describes the steps needed to implement the *storage*

¹This test method is under the jurisdiction of ASTM Committee E50 on Environmental Assessment, Risk Management and Corrective Action and is the direct responsibility of Subcommittee E50.03 on Beneficial Use.

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area harvesting plans from installation of the appropriate pre-*harvesting* components and *harvesting* the *CCPs* in accordance with the approval requirements, to completing the post-*harvesting* monitoring and inspections.

1.3.11 Sections 6 through 10 provide the five phases (Phase I through V) of the *harvesting* process that follow once *storage areas* are selected for *harvesting* evaluation. Information related to Phase I through V is located on Table 1.

1.4 This guide does not include information on the *process*ing of harvested *CCPs*, and therefore, additional approvals not discussed within this guide may be needed (for example, residual waste *processing* approvals, air approvals specific to *processing*, water control approvals, storage system approvals, etc.).

1.5 As CCPs are produced, they may be sent off-site directly to beneficial use applications, such as concrete, wallboard and controlled or structural fills, while the alternative is to direct them to dry or wet storage areas. Although many CCPs were placed in storage due to not meeting applicable specifications for use, many other CCPs were stored for lack of market. In either case, the CCPs retain the ability to be considered a wanted material that provides a functional benefit and a benefit to the environment. They can be harvested and lightly processed, if necessary, to meet relevant product specifications and substitute for the raw materials. Depending on the type and homogeneity of *CCPs* and the type of *storage area* from which the materials are being harvested (that is, dry or wet storage areas), this harvesting and processing may include, but is not limited to, excavating or dewatering/dredging, drying, milling, classifying and storing or transporting the material before they are beneficially used.

1.6 The *CCPs* that may be harvested include: *fly ash, bottom ash* and *economizer ash* generated by powdered carbon boilers; *boiler slag; flue gas desulfurization material; fluidized-bed combustion* products as defined in Terminology E2201; *ceno-spheres*; or other materials suitable for beneficial use.

1.7 Laws and approval requirements governing the use of CCPs vary by locality, state and country and generally do not yet include provisions for CCP harvesting as described herein. The user of this guide is responsible for determining and complying with the applicable approval requirements, which may extend beyond harvesting to include approval requirements or guidance on issues such as storage, transportation, end use and other concepts. This guide complements approval programs where guidance on *harvesting* is unavailable or insufficient, thereby improving the chance that such storage areas may be repurposed for public or private benefit, or both. It is important to engage and educate the *approval authority* early and often throughout the planning, design and implementation of the harvesting activities. The project team may also consider affording an opportunity to solicit input from other stakeholders.

1.8 This guide should not be used as a justification to avoid, minimize or delay implementation of specific management, operation, *closure*, or remediation activities, or both as appropriate by law or directive, unless the *harvesting* activities are conducted in conjunction with such strategies to maintain or

achieve compliance with the approval requirements or as otherwise agreed upon with the appropriate authorizing agencies.

1.9 This guide should not be used to characterize (that is, environmentally assess) a *storage area* for ownership transfer although portions of such information may supplement other environmental assessments that are used in such a transfer.

1.10 This standard does not purport to address all of the safety concerns, if any, associated with its use. It is the responsibility of the user of this standard to establish appropriate safety, health, and environmental practices and determine the applicability of regulatory limitations prior to use.

1.11 This international standard was developed in accordance with internationally recognized principles on standardization established in the Decision on Principles for the Development of International Standards, Guides and Recommendations issued by the World Trade Organization Technical Barriers to Trade (TBT) Committee.

2. Referenced Documents

- 2.1 ASTM Standards:²
- C311 Test Methods for Sampling and Testing Fly Ash or Natural Pozzolans for Use in Portland-Cement Concrete C618 Specification for Coal Fly Ash and Raw or Calcined
- Natural Pozzolan for Use in Concrete
- D653 Terminology Relating to Soil, Rock, and Contained Fluids
- E2201 Terminology for Coal Combustion Products
- E2277 Guide for Design and Construction of Coal Ash Structural Fills

3. Terminology

3.1 For additional definitions related to *coal combustion products* (*CCPs*), see Terminology E2201. For definitions related to geotechnical properties, see Terminology D653.

- 3.2 Definitions:
- 3.2.1 active facility, n-a facility producing electricity.

3.2.2 active storage area, n—a storage area that has had *CCPs* placed within it, but has not completed *closure* in accordance with the *approval authority* requirements.

3.2.3 *approval authority, n*—an authority that is tasked to ensure compliance with environmental protection and public/ worker safety laws and directives concerning the management of *CCP storage areas*; this includes governments of cities, counties, states, countries, provinces and tribal organizations.

3.2.4 beneficial use of coal combustion products (CCPs), n—the use of or substitution of the coal combustion products (CCPs) for another product based on performance criteria. The CCPs will be used in a manner that meets the design specification, conserves natural resources and energy, reduces greenhouse gas emissions, and/or protects human health and the environment, along with other benefits. For purposes of this

² For referenced ASTM standards, visit the ASTM website, www.astm.org, or contact ASTM Customer Service at service@astm.org. For *Annual Book of ASTM Standards* volume information, refer to the standard's Document Summary page on the ASTM website.

definition, beneficial use includes, but is not limited to, raw feed for cement clinker, concrete, grout, flowable fill, controlled low strength material; controlled or structural fill; road base/sub-base; soil modification; mineral filler; snow and ice traction control; blasting grit and abrasives; roofing granules; mining applications; wallboard; waste stabilization/ solidification; soil amendment; and agriculture.

3.2.4.1 *Discussion*—See Terminology E2201 for more information.

3.2.5 *boiler slag, n*—a molten ash collected at the base of slag tap and cyclone boilers that is quenched with water and shattered into black, angular particles having a smooth, glassy appearance.

3.2.6 *bottom ash, n*—agglomerated ash particles formed in pulverized coal boilers that are too large to be carried in the flue gases and impinge on the boiler walls or fall through open grates to an ash hopper at the bottom of the boiler.

3.2.6.1 *Discussion*—See Terminology E2201 for more information.

3.2.7 *caps or cover, n*—natural (for example, engineered soil *liners* or *caps*) or synthetic (for example, linear low-density polyethylene, LLDPE) materials placed on the top of a *storage area* to minimize the infiltration of rainwater into the *storage area*.

3.2.8 *cenospheres*, *n*—lightweight, inert, hollow spheres made largely of silica and alumina and filled with air or inert gas, typically produced as a byproduct of coal combustion at power plants.

3.2.9 closure, n—for permitted storage areas, closure of a storage area is completed by either meeting harvesting goals and project endpoints or installing a *cap/cover*, as appropriate, per the *approval authority*.

3.2.10 *coal ash*, *n*—a collective term referring to any solid materials produced primarily from the process of combustion of coal (for example, *fly ash*, *bottom ash*, or *boiler slag*).

3.2.11 coal combustion products (CCPs), n—fly ash, bottom ash, boiler slag, fluidized-bed combustion (FBC) ash, or flue gas desulfurization (FGD) material produced primarily from the combustion of coal or the cleaning of the stack gases.

3.2.12 *contact water, n*—the liquid byproduct of *CCP* placement or *harvesting* within the *active* or *inactive storage area* whose origin may be the *CCPs* combined with rainwater that runs off the *CCPs* and does not infiltrate the *CCPs*.

3.2.13 *dry CCPs, n*—*CCPs* placed in a *dry storage area* not containing free liquids.

3.2.14 *dry storage area, n*—the location where *dry CCPs* are stored; a dry stack, valley fill, landfill, storage unit or cell, which is designed to hold an accumulation of *CCPs* and *leachate*.

3.2.15 *economizer ash*, *n*—*coal ash* that exits the combustion chamber carried in the flue gases used by the economizer, which is typically captured by hoppers. *Economizer ash* is heavier/coarser than *fly ash*, but lighter/less coarse than *bottom ash*.

3.2.16 *engineering controls, n*—constructed measures that minimize the flow of liquids into or out of a regulated *storage area* (for example, engineered soil *liners* or *caps, leachate* collection and removal systems, dewatering systems, and surface water management systems).

3.2.17 *environmental professional, n*—a person trained and experienced in the management of materials and *storage areas*; he or she has the credentials to make professional judgments about the acceptability of how land is used, potential impacts to safety, human health and the environment, and the effective-ness of *engineering, institutional and regulatory controls*.

3.2.18 *facility*, *n*—all contiguous land and structures associated with the power plant, other appurtenances, and improvements on the land, used for treating, storing, disposing or otherwise conducting solid waste management of *CCPs*. A *facility* may consist of several treatment, storage, or disposal operational units (for example, one or more *active* or *inactive storage areas*).

3.2.19 *flue gas desulfurization (FGD), n*—removal of gaseous sulfur dioxide from boiler exhaust gas.

3.2.19.1 *Discussion*—See Terminology E2201 for more information.

3.2.20 *flue gas desulfurization (FGD) material, n*—a product of an *FGD* process typically using a high-calcium sorbent such as lime or limestone.

3.2.20.1 *Discussion*—See Terminology E2201 for more information.

3.2.21 *fluidized-bed combustion (FBC) ash, n*—the *fly ash* and bed ash produced by an FBC boiler.

3.2.22 *fly ash*, *n*—*coal ash* that exits a combustion chamber in the flue gas and is captured by air pollution control equipment such as electrostatic precipitators Baghouses, and wet scrubbers.

3.2.23 harvesting, v—the removal, or reclamation, of CCPs

from an *active* or *inactive storage area* for the purpose of beneficial use.

3.2.24 harvesting phase, n—a segment of the overall storage area harvesting that strategically divides the harvesting area based on the anticipated sequence of harvesting within the storage area, while considering issues such as site access, harvesting rate, management of liquids during harvesting, and end use.

3.2.25 *harvesting sub-phase*, *n*—a subdivision of a *harvest-ing phase* that provides further detail on *harvesting* activities including proposed grades; management of *leachate*, *contact water* and surface water; placement of cover; and removal/ addition of infrastructure as *harvesting* progresses.

3.2.26 *historic CCP fill material*, *n*—*CCPs* typically that were placed before effective regulatory requirement governed material placement, and therefore, they were stored without a permit or an approval obtained by an *approval authority*.

3.2.27 *historic (or unpermitted) storage area, n*—the location where *historic CCPs* were placed before effective environmental regulatory requirements governed material placement.

3.2.28 *inactive facility, n*—a *facility* not producing electricity.

3.2.29 *inactive storage area*, *n*—a *storage area* that has had *CCPs* placed within it and has completed *closure* in accordance with the *approval authority* requirements, or has not placed *CCPs* within a period specified by the *approval authority* (as applicable).

3.2.30 *institutional controls, n*—administrative measures (of an *approval authority*) that guide users and owners of *CCP* storage areas on appropriate or prohibited activities, and deliverable documents concerning the control of *leachate*, stormwater runoff and water infiltration. These conditions may include what is allowed, what is to be measured during inspections, and what is to be done if conditions exceed what is considered acceptable. The *environmental professional* may recommend such controls in their evaluation of a site using this guide, in addition to what an *approval authority* requires.

3.2.31 *leachate*, n—the liquid byproduct of placement within an *active* or *inactive storage area* whose origin may be of the following sources: (1) the CCP material itself; (2) the CCP material combined with rainwater that infiltrates the CCP material; or (3) the CCP material dissolved in groundwater that has infiltrated the *storage area* (typically at the base of a pre-approval *storage area*).

3.2.32 *liners*, *n*—natural (for example, engineered soil *liners*) or synthetic (for example, high density polyethylene, HDPE) materials placed on the bottom and sidewalls of a *storage area* to contain *leachate* and prevent or minimize the infiltration of *leachate* to groundwater.

3.2.33 *permitted storage area, n*—storage area where the placement of *CCPs* was governed by approval from an *approval authority* (that is, governing documents regulate the construction, operations and *closure* of the *storage area*).

3.2.34 post-closure care measures, n—activities that the CCP storage area owner must take to maintain the effectiveness of engineering and institutional controls that protect against potential adverse impacts to human health, public safety, and welfare; applies to a storage area under the authority of an approval authority.

3.2.35 *processing*, *v*—activities through which the *CCP* undergoes, such as, dewatering, dredging, drying, and/or milling of *CCPs* prior to storage and/or transportation of the materials to end use.

3.2.36 *project team*, *n*—two or more professionals (including the *environmental professional*) who collaborate on the evaluation and selection of a *CCP storage area* to be harvested. The team may include the user; *environmental professionals*; the local, state and country *approval authority*; ash management/marketing partner; and the *storage area* owner and/or his or her representatives. For some *storage areas*, the *project team* may also include community *stakeholders*.

3.2.37 *run-off*, *n*—any rainwater, *leachate*, or other liquid that drains over land from any part of a *CCP storage area*.

3.2.38 *run-on*, *n*—any rainwater, *leachate* or other liquid that drains over land onto any part of the *CCP* storage area.

3.2.39 *stakeholders, n*—a person with an interest in the outcome of a decision to harvest *CCPs* from the *storage area*; includes the property owner, energy producers, neighboring property owners, community representatives, development and conservation groups, sustainability advocates, and other interested parties.

3.2.40 storage area, *n*—an area where wet CCPs (wet storage area) or dry CCPs (dry storage area) are stored within a facility.

3.2.41 storage area closure, *n*—the transition period of a regulated storage area between the active receipt of *CCPs* and the start of the post-closure care period; often involves the installation of the storage area cap that isolates the *CCPs*. Historic storage areas may not be able to achieve "closure".

3.2.42 storage area post-closure care period, n—following closure of storage area, a span of time in which the storage area may need to be inspected and/or monitored in accordance with requirements determined by the approval authority (as applicable).

3.2.43 *unpermitted storage area, n*—storage area where the placement of *CCPs* was not governed by approval from an *approval authority* (that is, a *historic storage area* where governing documents do not regulate the construction, operations and *closure* of the *storage area*).

3.2.44 wet CCPs, *n*—CCPs that were hydraulically placed in a *storage area*.

3.2.45 *wet storage area, n*—the location where *wet CCPs* are stored; a topographic depression, man-made excavation, impoundment or diked area, which is designed to hold an accumulation of *CCPs* and liquids.

4. Significance and Use

4.1 *Purpose*—This guide provides a process for reclamation of existing *CCPs* placed in *active* and *inactive storage areas*. The guide includes information on the following activities required for the safe and effective reclamation of *CCPs* from *storage areas*: (1) Background Review of *CCP Storage Areas*; (2) Detailed Characterization of *CCP Storage Areas*; (3) *Harvesting* Planning and Scoping of *CCP Storage Areas*; (4) *Harvesting* Detailed Design and Approval of *CCP Storage Areas*; and (5) *Harvesting* Implementation of *CCP Storage Areas*. More detailed descriptions of these activities are in Sections 6 through 10.

4.2 Potential Beneficial Uses of CCPs—There are many CCP storage areas that are potentially harvestable and can provide a functional benefit in a wide variety of beneficial uses. The beneficial use of CCPs contained in these storage areas can have significant environmental and economic benefits for the facility, the facility owner and the local economy, and can significantly reduce disposal operations (1-4).³Beneficial use of CCPs conomically manage the CCPs, while promoting conservation and recycling/reuse, meeting sustainability goals, and addressing the shortage of CCPs in some building product market

 $^{^{3}}$ The boldface numbers in parentheses refer to the list of references at the end of this standard.

areas (1, 2, 5). *CCPs* consist of *fly ash, bottom ash, boiler slag, fluidized-bed combustion (FBC) ash, economizer ash,* and *flue gas desulfurization (FGD) material* (see Terminology E2201 for definitions of *CCPs*) (6, 7).

4.2.1 Fly ash is the most abundant CCP in existing storage areas. Its beneficial uses include, but are not limited to: partial replacement for cement in concrete and concrete products once in concrete, fly ash reacts with Portland cement to create additional reaction products that improve the strength and durability of concrete; raw feed for the production clinker - flyash can be calcined along with other minerals to produce clinker; blended cements - fly ash can be an important component in the production of blended cement, especially when pozzolanic properties are desired; filler in plastics - flyash typically increases the stiffness and compressive strength when used as a filler in plastics; controlled low strength materials (CLSM) - CLSM that include fly ash, typically have improved flowability and strength as well as reduced bleeding and shrinkage; as a soil stabilization material; as an aggregate/ soil replacement construction material in structural fill and mine reclamation projects; fillers in carpet backing - fly ash is high performance mineral filler; and as a solidification agent within landfills and remediation projects (6-9).

4.2.2 *Bottom ash* can be beneficially used as raw feed for the production of clinker, as a component of structural fills, and as aggregate in the manufacturing of masonry products (6, 7, 9).

4.2.3 *Boiler slag* can be used as blasting grits and roofing granules. Other applications include, but are not limited to, as a component of structural fills and mineral filler in asphalt (7, 9).

4.2.4 *Fluidized-bed combustion (FBC) ash* can be utilized in various mixtures as a low strength concrete material and soil stabilization agent (7).

4.2.5 *Flue gas desulfurization (FGD)* gypsum, in its majority, is typically beneficially used in gypsum panel products. Other uses include in agricultural applications to improve soil, as a component in structural fills, and as an important component in the production of cement (6, 7, 9).

4.3 Approval Context—This guide does not supersede local, state or country requirements, if applicable. This guide is intended to be used for *storage areas* that are both within an *approval authority* program and *historic (or unpermitted)* storage areas.

4.3.1 For *harvesting* of *CCPs* from *storage areas* within an *approval authority* program, governing documents should be carefully reviewed and followed to ensure that all requirements relative to design, operations, monitoring, *closure*, and post*closure* are followed, or that agreements are established to ensure compliance and allow for *harvesting* activities.

4.3.2 For harvesting of CCPs from historic (or unpermitted) storage areas, the project team should engage with the appropriate local, state, province, or country approval, or combination thereof, authorities to determine the appropriate requirements, and should ensure that the appropriate engineering controls and institutional controls are incorporated into the harvesting project. 4.4 Use of Guide—Approval authorities may incorporate this guide, in whole or in part, into general guidance documents or site-specific approval documents.

4.5 *Professional Judgment*—This guide presumes the active involvement of an *environmental professional* who is knowledgeable in how to design and construct *storage areas* and how to identify acceptable site conditions, or when appropriate, satisfy applicable statutory or *approval authority* limitations on the use of an operating, closed, or *historic (unpermitted) storage area*.

4.6 *Inherent Uncertainty*—Professional judgment, interpretation, and some uncertainty are inherent in the processes described herein even when decisions are based upon objective scientific principles and accepted industry practices.

5. Project Planning and Scoping

5.1 Prior to applying this guide, the user should perform the following project planning and scoping activities: (*a*) identify an *environmental professional* to assist with the technical components of the project; (*b*) develop a *project team*; (*c*) identify site and *storage areas* to be potentially harvested; (*d*) determine the potential beneficial uses of the *CCPs*; and (*e*) compile site data.

5.1.1 The user should identify an *environmental professional*, who for purposes of this guide, is a person who possesses sufficient education, training, experience and certifications (as applicable), and exercises sound professional judgment regarding the components of this guide.

5.1.2 The user should assemble a *project team* that considers attributes such as historical site knowledge; technical expertise relevant to the components of this guide including the investigation, assessment, design, approval process (as applicable), construction, operation, monitoring and maintenance of *active/inactive storage areas* that are protective to human health, public safety and welfare; *approval authority* requirements; and *stakeholder* interests and concerns, if known.

5.1.3 Prior to using this guide, the user should determine which *storage areas* could provide useful *CCPs* for beneficial use and should be evaluated for potential *harvesting*. This guide is to be used to evaluate the potential *harvesting* of *storage areas* once the *storage areas* are selected for evaluation.

5.1.4 The user may prepare an initial determination of the potential uses of the *CCPs* from the available *storage areas* at the *facility*. These may be refined following completion of the Site Background Review and Detailed Characterization of *CCP Storage Areas* tasks (see Sections 6 and 7, respectively).

5.1.5 The user should compile land use, historic environmental compliance, geologic and hydrogeologic, topographic, design and construction-related information (if available); estimate project costs and develop the project schedule with contingencies (if feasible); and identify other factors that may impact the ability to harvest the *CCPs*.

5.2 When an *approval authority* program governs *harvest-ing* of *CCPs*, the user should evaluate whether the applicable *approval authority* program and the goals and requirements of

this guide complement each other and are protective to human health, public safety and welfare.

5.3 *Process*—The five phases of the *Harvesting Coal Combustion Products* Stored in *Active and Inactive Storage Areas* guide are presented on Table 1. Detailed information on the five phases are presented on Figs. 1-5 and in Sections 6 through 10.

6. Background Review of CCP Storage Areas, Phase I (see Fig. 1)

6.1 A Background Review of the *CCP Storage Areas* should be initiated after the Project Planning and Scoping activities are completed (see Section 5), including identification of an *environmental professional* and *project team*, determination of which *storage areas* should be evaluated for potential *harvesting*, initial determination of potential beneficial uses of *CCPs*, and compilation of relevant *storage area* information (see 5.1.5).

6.2 Site Background Review of CCP Storage Areas Steps— The Site Background Review of CCP Storage Areas process follows the following three steps: Step 1 – Determine the Approval Authority Applicability of Storage Areas; Step 2 – Determine if Harvesting CCPs Will Meet End Use Criteria; Step 3 – Establish Baseline Conditions of CCP Storage Areas. The three steps are summarized below and shown on Fig. 1.

6.2.1 Step 1: Determine the Approval Authority Applicability of Storage Areas—A review of local, state, country and province requirements should be completed to determine *approval authority* and compliance criteria that may be applicable. Such criteria may apply to both the *harvesting* of the *CCPs*, as well as the actual beneficial use of the *CCPs* or other issues.

6.2.1.1 Permitted facilities may have specific approval and compliance criteria stated in the operational, *closure* or post*closure* documents, or both and other *approval authority* criteria may exist outside of applicable permits that may apply to *harvesting*.

6.2.1.2 Unpermitted facilities may use general standard operating procedures, existing requirements for permitted facilities or other arbitrary guidelines, or both that may apply to *harvesting*.

6.2.2 Step 2: Determine if Harvesting CCPs Will Meet End Use Criteria—A general review of the potential end use specifications, technologies and performance standards should be completed. In their absence, development of new specifications or changes to existing standards should be considered. If CCPs do not meet current end use specifications and performance standards for a specific application, consider what

amendments or *processing* could be made to the raw *CCPs* to meet the end use specifications and performance standards, or whether changes to the specifications and standards could be made to allow *harvesting* of *CCPs* to be feasible, or both.

6.2.2.1 Review existing chemical, physical and geotechnical information for the *CCPs* relative to the requirements of the intended end use.

6.2.2.2 Review estimated volume of *CCPs* that may be obtained during *harvesting* activities to assess feasibility of project.

6.2.2.3 Review transportation considerations and distance between the source and the end use.

6.2.3 Step 3: Establish Baseline Conditions of CCP Storage Areas—A review of available data related to the CCP storage areas' attributes should be completed to establish baseline conditions. Such attributes include, but are not limited to: facility layout and infrastructure; storage area configuration, design, and fill sequencing/phasing; types, homogeneity, age, liquid content, physical/chemical characteristics, and volume of CCPs; geologic, hydrogeologic and hydrologic conditions; and roadways/transportation hubs and surrounding environs.

7. Detailed Characterization of CCP Storage Areas, Phase II (see Fig. 2)

7.1 A Detailed Characterization of *CCP Storage Areas* should be initiated after completion of the Site Background Review of *CCP Storage Areas*, including the determination of the applicability of *approval authority* involvement, feasibility of the *harvesting* of the *CCP storage areas*, and establishing baseline conditions for management of the *harvesting* unit.

7.2 Detailed Characterization of CCP Storage Areas Steps—The Detailed Characterization of CCP Storage Areas process follows the following five steps: Step 1 – Develop CCP Characterization Sampling and Analysis Plan; Step 2 – Perform Appropriate CCP Sampling; Step 3 – Perform Appropriate Laboratory Analyses; Step 4 – Evaluate Results of Characterization; Step 5 – Determine Suitability of CCPs for Harvesting. The five steps are summarized below and shown on Fig. 2.

7.2.1 Step 1: Develop CCP Characterization Sampling and Analysis Plan—A CCP Characterization Sampling and Analysis Plan should be prepared to augment the baseline information.

7.2.1.1 The plan should establish the data quality objectives and sampling protocols needed to obtain adequate datasets appropriate to maintain approval compliance and meet end use specifications and performance standards. A description of the assessment of the representativeness of the samples or a

TABLE 1 Harvesting Phase Information

Note 1-Process assumes the storage areas have already been chosen. Site selection is not included in this Guide.

Phases	Description	Location within this guide
I	Site Background Review of CCP Storage Areas	Fig. 1 and Section 6
II	Detailed Characterization of CCP Storage Areas	Fig. 2 and Section 7
111	Harvesting Planning and Scoping of CCP Storage Areas	Fig. 3 and Section 8
IV	Harvesting Detailed Design and Approval (if required) of CCP Storage Areas	Fig. 4 and Section 9
V	Harvesting Implementation of CCP Storage Areas	Fig. 5 and Section 10