

Important Information
Concerning OMB's Critique of
EPA's Proposed Rule on
Coal Combustion Residuals (CCR)

A Win-Win Solution

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NanoImproved - Leader in Nanotechnology Sterilization
for a safer, healthier and longer life
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Current Debate and Situation
on CCR is Confusing

The Debate:

Is coal ash safe or hazardous?

The Confusion:

The definitive answer is --- **YES!**

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**Information Provided to OIRA
at 26 EO 12866 Meetings on CCR**

Current Positions

Status Quo / Subtitle D	vs.	Subtitle C
safe	vs.	hazardous
jobs / economy	vs.	environment

Information to Support own position is ...	Solid *	Solid
Information to Attack the other position is ...	Weak	Weak

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* - Costs based on TVA's Kingston Ash spill are false

**Information Provided to OMB/OIRA
at 26 EO 12866 Meetings on CCR**

Solid * -- * - Costs based on TVA's Kingston Ash spill are false

Information provided to OMB included financial projections based on costs and actions TVA took or plans to take to clean up the Kingston ash spill.

According to TVA Inspector General's report, those costs and actions are inaccurate and questionable.

For relevance and accuracy, any cost/benefit analysis on CCR should not use numbers that include TVA's costs or actions.

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Win-Win Solution

Change the Question

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Resolving the Dilemma

Ask:

When is coal ash safe or hazardous?

The answer:

Coal ash is safe when properly recycled
--- currently 43% of coal ash

Coal ash is hazardous in large volumes
and when exposed to wind, rain or water
--- currently 57% of coal ash

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Examples of Safe and Hazardous Coal Ash

Coal ash used for road fill Spread out and protected from the elements	Safe
Coal ash used as soil fill material Water and Rain leach out contaminants	Hazardous
Coal ash used as reef material Hydrostatic pressure prevents leaching	Safe
Coal ash used for building cinder block docks Tide water leaches out contaminants	Hazardous

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Defining When Coal Ash is Safe and Properly Recycled

Loose coal ash recycled:

MUST be protected from wind, rain and water.

Transport - Enclosed or covered

Consumption - Expediently (> 3 months)

Storage - First in-First out (NO Last in-First out)

Coal ash products:

~99% safe when calculated by:

Percentage x Porosity x Volume

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Defining When Coal Ash is Hazardous

Loose coal ash not recycled:

MUST be protected from wind, rain and water.

Transport - Enclosed or covered

Storage - Enclosed or covered

Disposal - Covered and lined

Coal ash surface impoundment dams:

NOT safe - close and remediate

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Hybrid Coal Ash Rule A Winning Solution

Winners

Reasons

The Public

People whose health is being harmed by coal ash pollution will now be protected.
Electricity rates stay the same.
No job loss

The environment

Recycling substantially lowers CO2 pollution from using virgin material in construction projects.
Hazardous excess coal ash is tightly controlled.

Utilities

Recycling maintains current relationships and services.
Allows the utilities to sell the coal ash to lower operating costs.
No job loss

Industry

Recycling provides inexpensive raw material.
Electricity rates stay the same
No job loss

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Moving Forward

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Hybrid Coal Ash Rule and Using NewRock™ Becomes A Triumphant Solution

The same winners but so much more:

Creates **Jobs - Jobs - Jobs**

Eliminates ALL coal ash pollution

Dry system is a Cost Savings to Utilities

Economically remediates coal ash ponds

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