

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.

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.

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.

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.