Subject: Re: test
Date: Thursday, February 18, 2016 at 12:54:17 PM Central Standard Time
From: Souders, Steve <Souders.Steve@epa.gov>
To: Mark Quarles <markquarles@comcast.net>
CC: Schoenborn, William <Schoenborn.William@epa.gov>

Hi Mark,

We do not have an official definition of the term "dewatered" with respect to closure of a CCR surface impoundment with CCR in place and, as you noted, we did not elaborate on this in the preamble to the CCR rule. However, section 257.102 (d) of the rule sets forth requirements for CCR surface impoundments closing with the CCR in place, specifically, section 257.102(d) (2) requires the owner or operator of a CCR surface impoundment (CCR unit) to eliminate free liquids by removing liquid waste and/or solidifying the remaining wastes and waste residues prior to installing the final cover system. The remaining wastes and waste residues must be sufficiently stabilized to support the final cover system. For purposes of the rule “free liquids” is defined as liquids which readily separate from the solid portion of a waste under ambient temperature and pressure. So while the rule does not explicitly require that dewatering include removal of pore water, in order to meet these requirements, the pore water may also need to be removed.

Regarding your questions pertaining to uppermost aquifers, please contact Bill Schoenborn (who I've copied on this email) by phone at 703-308-8483 or by email at schoenborn.william@epa.gov.

I hope this helps.

Steve Souders
U.S. Environmental Protection Agency
Office of Resource Conservation and Recovery
Materials Recovery and Waste Management Division
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Washington, DC 20460
Phone: 703-308-8431

From: Mark Quarles <markquarles@comcast.net>
Sent: Wednesday, February 17, 2016 4:11 PM
To: Souders, Steve
Subject: test

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