

“Current characterization practice relies heavily on laboratory leaching tests, in particular the TCLP, to evaluate the potential hazards of CCR placement in mines. These tests do not use leaching solutions that are representative of the large range of geochemical conditions likely to be encountered in mines, and they may greatly underestimate the actual leaching that will occur.”

National Research Council, *Managing Coal Combustion Residues in Mines*, 2006, page 127