PENNSYLVANIA COAL ALLIANCE

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April 29, 2019

Technical Guidance Coordinator
Pennsylvania Department of Environmental Protection
Policy Office
Rachel Carson State Office Building
400 Market Street
Harrisburg, PA 17101

Re: Comments of the Pennsylvania Coal Alliance on Alkaline Addition for Surface Coal Mines Technical Guidance Document 563-2112-217

The Pennsylvania Coal Alliance (PCA) is the principal trade organization representing underground and surface bituminous coal operators in Pennsylvania, as well as other associated companies whose businesses rely on coal mining and a strong coal economy. PCA member companies produce 90 percent of the bituminous coal mined annually in Pennsylvania. Coal production in 2018 totaled over 48 million tons, making the Commonwealth the third largest coal producing state. Coal mining helps drive the Pennsylvania economy, supporting nearly 18,000 jobs, contributing $4.1 billion annually to the state's economy, and $7 billion in total output. The Pennsylvania coal industry creates this economic value in communities across Pennsylvania, with active mining operations in fifteen counties, multiple company locations in more than half of Pennsylvania's counties, and contributes $2.5 billion in property taxes. The industry accounts for 25 percent of the employment in some regions of the state, supports upwards of 40 percent of the local tax base, and often serves as a community's financial cornerstone for economic development.

The PCA provides the following comments on the Department's draft Alkaline Addition for Surface Coal Mines Technical Guidance Document (TGD) 563-2112-217.

Site Characteristics and Water Quality Criteria

In considering alkaline addition for special protection watersheds, current regulations do not prohibit the use of alkaline addition in special protection watersheds and, therefore, should not be prohibited in a TGD.

Determination of Alkaline Addition Rates

The reference to "wild trout streams" in the Table 1: Alkaline Addition Matrix should be updated to "Class A Wild Trout Streams," which classify as a High Quality Water under 25 Pa Code §93.4b(a)(2)(ii) and is consistent with description of special protection watersheds under the "Site Characteristics and Water Quality Criteria" section in the draft TGD. Further, PCA suggests that a column be added to Table 1: Alkaline Addition Matrix for deep mine openings given the limited amount of overburden extraction that is conducted.

In determining the receiving stream quality and previous mining status, the criteria under "A. Primarily remining" states "These sites must meet effluent limits under Subchapter F of Chapter 87 or Subchapter G of Chapter 88" yet "Table 1: Alkaline Addition Matrix" states "Primarily remining and/or Sub F/G." PCA suggests that the language be adjusted to reflect that the Sub F/G does not have to correspond with the site being primarily remining.

Current regulations do not prohibit the use of alkaline addition in special protection watersheds and, therefore, should not be prohibited in a TGD under "D. Special protection watersheds."

Co-Products and General Permits

In reviewing the process for DEP to approve the use of general permit material or co-product, the draft document cites TGD 563-2112-208. PCA believes the correct citation should be TGD 563-2112-001, Beneficial Use of General Permit (GP) Materials at Active Coal Mines. Further, while coal ash has limitations for placement in 25 Pa Code Chapter 290, the same limitations do not apply to the use of residual waste in Chapter 287 and should be included in the draft TGD as an acceptable coproduct. The reference to special protection watersheds should be updated to "Class A Wild Trout Streams," which classifies as a High Quality Water under 25 Pa Code §93.4b(a)(2)(ii) and is consistent with description of special protection watersheds under the "Site Characteristics and Water Quality Criteria" section in the draft TGD.

Monitoring Requirements

PCA suggests the reference to "downgradient monitoring wells" be removed and replaced with "downgradient monitoring points." Downgradient monitoring wells often do not well represent the mined area and can often be dry. Further, drilling backfill wells is often unsuccessful in loose rock and can result in monitoring a localized area. Downgrade monitoring points offer a more accurate representation of water quality as they naturally gather water.

The PCA appreciates the opportunity to provide these comments and looks forward to working with the Department to revise the Policy. Please contact me if we can be of assistance or if you would like to discuss our comments.

Sincerely,

Rachel Gleason

Rachel Gleason
Executive Director
Pennsylvania Coal Alliance