

Western Pennsylvania Coalition for Abandoned Mine Reclamation

Donohoe Center, RD 12 BOX 202B, Greensburg, PA 15601 (724) 837-5271 (724) 552-0143 (fax) wpcamr@verizon.com AMRClearinghouse.org

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The Honorable Kathleen McGinty, Secretary Department of Environmental Protection Rachel Carson State Office Building PO Box 2063 Harrisburg, PA 16105-2063

Dear Secretary McGinty:

The Western Pennsylvania Coalition for Abandoned Mine Reclamation has had over a 20 year history as a non-profit organization whose sole focus is to reverse the ravishes of past mining practices in the Commonwealth. We work as a coalition of 24 Conservation Districts in the bituminous coal fields of western Pennsylvania and support watershed associations and other conservation minded organizations who are willing to become involved in abandoned mine reclamation efforts. We embrace public-private partnerships as a means of getting the job done.

Pennsylvania's legacy of abandoned mine lands and polluted waters is well known. The reclamation costs associated with these problems are measured in billions of dollars and even the most optimistic projections place complete clean-up and remediation decades into the future. In spite of the tremendous battle before us, Pennsylvania has made significant strides and commitments in reclaiming our lands and waters from the ravages of old mining practices. We recognize that the problems are so large that no single source, be it federal, state, of local governments, or private industry, can provide the necessary recourses in totally cleaning up the mess. To ever get the job done means strategically working together and working smarter.

A prime example of working together and working smarter comes from the power industry where material from coal refuse piles is burned in specialized facilities known as co-generation plants. Power is produced from the residual energy in the refuse and in the process coal refuse piles are eliminated, a great service to the Commonwealth to be sure. An additional benefit is also realized: the combustion product is an ash containing significant levels of alkalinity. This product has acid-neutralizing and other useful properties that make it useful in land and water reclamation projects. What would normally be a waste product becomes an asset to remediation efforts and avoids unnecessary land filling.

As should be the case, combustion ash must be certified by the DEP for beneficial use for specified purposes in specified situations. When held to the rigors of oversight, this ash has been shown to be a safe and beneficial product for its intended use. Research by credible workers and institutions support this view. Indeed, ash has helped in the reclamation of approximately 150 sites in

Pennsylvania in a variety of ways without problem. It can be used in making soil substitutes, can limit water infiltration into acid and metal producing materials (such as a coal refuse pile) thus reducing the amount of pollution formed, and be can used in filling mine voids while reducing subsidence potential and neutralizing acids. Contaminants in ash such as arsenic generally approximate those in natural soils and leaching into surrounding soils has not been observed to any appreciable level when used as prescribed. This ash has proven to be environmentally safe and an important tool in abandoned mine reclamation projects. Its continued use should not only be allowed, but encouraged.

I have recently reviewed a draft document prepared by the Pennsylvania Department of Environmental Protection titled "Coal Ash Beneficial Use in Mine Reclamation and Mine Drainage Remediation in Pennsylvania." We commend the Department and the authors of this outstanding document for the thorough and comprehensive treatment on the use of coal combustion products in abandoned mine reclamation. The document successfully encapsulates the science and practice of this product's use. Additionally, the document supports the conclusions reached by the Joint Legislative Air and Water Pollution Control and Conservation Committee that deemed the product as safe and beneficial for reclamation projects when used as prescribed in Pennsylvania's model regulatory program. The draft document promises to become the definitive work on the beneficial use of coal ash in reclamation.

This story of cooperation and partnerships with industry, government, academia, and organizations is a shining example of how, when working smarter and together, great things can happen in reclaiming and protecting the environment. We applaud the Department of Environmental Protection for its leadership and its role in this most important and timely subject. Congratulations on a job well done!

Sincerely,

Bruce Golden,

Regional Coordinator

cc: J. Scott Roberts, R. Hornberger, A. Dalberto