



SCHUYLKILL HEADWATERS ASSOCIATION

*To Protect, Preserve, and Restore the Schuylkill Watershed within Schuylkill County
PO Box 1385, Pottsville, PA 17901*

April 16, 2004

Honorable Kathleen A. McGinty
Secretary
Pennsylvania Department of Environmental Protection
PO Box 2063
Rachel Carson Building
Harrisburg, PA 17105-2063

Ref: Beneficial Use of Coal Ash in Abandoned Mine Reclamation

Dear Secretary McGinty:

Schuylkill Headwaters Association, Inc. (SHA) was formed in 1997 to help identify acid mine drainage (AMD) problem areas of the headwaters and tributaries of the Schuylkill River and to recommend and implement AMD abatement projects and stream restoration projects. Our objective is to bring life back to streams in an effort to enhance benefits such as the enjoyment of fishing and ecotourism for the region's communities.

SHA partnered with the Schuylkill Conservation District, Eastern Pennsylvania Coalition for Abandoned Mine Reclamation, and Schuylkill Riverkeeper on completing an assessment of the Schuylkill River Watershed within the boundaries of Schuylkill County. The assessment identified over 160 AMD discharges within the headwaters of the Schuylkill. The assessment also pointed out many recharge areas, sites where water can enter the mine pool to become acid mine drainage.

The watershed assessment has given our organization a unique perspective of problems concerning reclamation of abandoned mine discharges and mine sites in our area. We have invited guest speakers to our meetings and taken field trips to cogeneration stations, coal breakers, reclamation sites and abandoned pits. Our watershed includes several reclamation projects (Wheelabrator - Morea, Gilberton Power - Ellengowan, NEPCO - Big Gorilla Pit) that have shown positive results from the use of coal ash.

The members of our organization believe coal ash used for mine land reclamation is safe and can be beneficial for the environment. We have seen the elimination of culm banks and

reclamation of mine scarred areas while adding an economic benefit to our region. There has been a reduction in culm banks that add sediment, acidity, and metals to our streams. There also has been a reduction in recharge areas to the mine pools thereby preventing surface water from being impaired. Coal ash has also been utilized to eliminate hazardous crop falls on Sharp Mountain in very close proximity to residences in the city of Pottsville.

SHA recently had the opportunity to review the draft document titled "Coal Ash Beneficial Use in Mine Reclamation and Mine Drainage Remediation in Pennsylvania." This document provides a thorough analysis of the use of coal ash. The document also supports the fact-based decision making of the Pennsylvania Department of Environmental Protection (Pa DEP) in its oversight of coal ash use in these reclamation projects. Pa DEP is to be applauded for its efforts to seek innovative, cost effective, beneficial uses for coal ash in mine land restoration.

Sincerely,

A handwritten signature in cursive script that reads "William Reichert/br".

William Reichert
President