Annual Report July 2019 – June 2020



Commonwealth of Pennsylvania Thomas W. Wolf, Governor Department of Environmental Protection Patrick W. McDonnell, Secretary



EDITOR'S NOTE: All references in this report - including position titles held by individuals, legislative references and time references - are current for the time period ending June 2020.

A Message from MRAB Chairman David Osikowicz

On behalf of the Mining and Reclamation Advisory Board (MRAB) members, I am pleased to present for your review the Board's Annual Report, documenting the Board's activities from July 2019 through June 2020. The Board continues to address environmental problems related to past coal mining practices and to assist the Department in ensuring that current industry practices represent an environmentally responsible approach to mining. This report fulfills the statutory obligations of the Surface Mining Conservation and Reclamation Act (SMCRA).

The Board holds four full board meetings per year, as outlined in the by-laws. For the 2018-2019 reporting period, full Board meetings were held on July 18, 2019; October 24, 2019; January 23, 2020; and April 2, 2020. The Reclamation Committee met on September 25, 2019 to further discuss the grading rates process for determining bonding rates. The Regulation, Legislation and Technical (RLT) Committee met on the following dates: a) March 16, 2020 to discuss: 1) amendments to the Coal Refuse Control Act (Act 74 of 2019); 2) revisions to the Water Supply Replacement Regulations (per Chapters 87, 88, 89 and 90); and 3) revisions to the draft Coal Civil Penalties Technical Guidance Document (TGD); and b) May 18, 2020 to continue discussions of the revisions to the Water Supply Replacement Regulations and the draft Coal Civil Penalties TGD. It should be noted that the meetings of March 16, 2020; April 2, 2020; and May 18, 2020 were held via Skype only, due to the COVID-19 emergency.

The July 18, 2019 meeting was held at the Pottsville District Mining Office in connection with the annual field trip the previous day. The sites visited during the field trip included: a)The Keystone Anthracite Marketing Corporation Mine Site; b) The No. 9 Mine and Museum (including a tour of the former underground coal mine); c) The BET Associates IV, LLC (former Lehigh Coal and Navigation) Mine; and d) The Route 309 Active Mine Drainage Treatment System.

During the time frame of this report, Pennsylvania Department of Environmental Protection (PA DEP) staff provided the Board with regular updates on the status of Bond Rate Guidelines, Bureau of Abandoned Mine Reclamation (BAMR) Projects and the Alternative Bonding System (ABS) Legacy Sites.

The Board will continue to provide advice and technical input to the Department regarding expenditures and program administration of Abandoned Mine Lands (AML) Title IV monies, proposed regulatory rulemaking issues including Act 95, permit fees, financial guarantee and OSM issues, and other environmental issues as they arise.

The Board recognizes the dedication and support of all Board members and alternates and the ongoing contributions by both PA DEP staff and Board members. Furthermore, the Board remains highly committed to advising and working with the department in carrying out its mission, evaluating the rights and responsibilities of industry, and making responsible, calculated recommendations for the citizens of the Commonwealth.

Sincerely,

David Osikowicz, Chairman

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Introduction

The Mining and Reclamation Advisory Board (MRAB) was created in 1984 by Act 181 of the Pennsylvania General Assembly, which amended the Surface Mining Conservation and Reclamation Act (SMCRA). The Board's purpose is to assist the Secretary of the Pennsylvania Department of Environmental Protection (PA DEP) in expending reclamation funds for the purposes provided by SMCRA and to advise the secretary on all matters pertaining to mining and reclamation. The advisory role of the Board also covers Title IV of SMCRA, which relates to abandoned mine land reclamation issues.

The Board is comprised of the following members:

- Two licensed bituminous surface mine operators;
- One licensed anthracite surface mine operator;
- Four public members of the Citizens Advisory Council, elected by the Council;
- One anthracite or one bituminous licensed professional engineer;
- One county conservation district representative, appointed by the Pennsylvania State Conservation Commission;
- One majority party state senator, appointed by the president pro tempore of the Senate;
- One minority party state senator, appointed by the president pro tempore of the Senate;
- One majority party state representative, appointed by the speaker of the House of Representatives; and
- One minority party state representative, appointed by the speaker of the House of Representatives.

The Board operates under bylaws adopted in January 1989 and amended in October 1993 and December 1996. The bylaws establish a committee structure and other operational procedures, including a minimum of four meetings per year, held in January, April, July and October, as required by SMCRA. *The bylaws current for the time period covered by this report are found in Appendix A*.

The Board's Committees

• Annual Report Committee

As mandated by Section 18(g)(5) of SMCRA, "The Board shall prepare an annual report on its activities and submit the report to the Senate Environmental Resources and Energy Committee and the House Conservation Committee." Throughout the reporting period, the committee compiles and summarizes information for inclusion in the Annual Report.

Members of the committee:

Rachel Gleason, Chairperson Duane Feagley Tara Hazelwood Darrel K. Lewis

• Policy Committee

The Policy Committee was formed in October 1993, under the name of "*Policy and General Issues Committee*." Its mission is to consider mining and reclamation policies identified as integral to the timely and efficient administration and operation of PA DEP's mining regulatory and abandoned mine reclamation programs.

Members of the committee:

Mark A. Snyder, Chairperson

• Reclamation Committee

The Ad Hoc Committee on Reclamation Issues was originally formed at the July 1997 Board meeting in response to concerns regarding the Bark Camp Mine Reclamation Laboratory in Clearfield County, the Reed and Strattanville sites in Clarion County and, a package of reclamation initiatives being developed under PA DEP's "Reclaim PA" program.

At the October 22, 1999 MRAB quarterly meeting, the Board voted unanimously to change the name to the Reclamation Committee to reflect the committee's ongoing work. The committee addresses reclamation issues, initiatives and activities.

Members of the committee:

Duane Feagley, Chairperson Robert E. Hughes Andy McAllister

• Regulation, Legislation and Technical Committee

The Regulation, Legislation and Technical Committee reviews all major regulatory packages coming before the Board during the reporting period and reports back to the full Board.

Members of the committee:

Jack R. Chamberlin, Chairperson The Honorable Tommy Sankey The Honorable Pamela Snyder The Honorable Patrick J. Stefano The Honorable John Yudichak Duane Feagley Rachel Gleason Darrel K. Lewis David D. Osikowicz

FULL BOARD

SMCRA mandates that the MRAB meet four times per year. Throughout the reporting period, the full Board met four times. The following sections provide a summary of the activities of the full Board. For a complete list of meeting dates and locations, see **Appendix D**. Also, for more details on these meetings, refer to the MRAB web site and, the MRAB meeting minutes.

2019-2020 MAIN AGENDA TOPICS (Presented Alphabetically)

Abandoned Mine Lands (AML) Program Reauthorization

PA DEP presented the Board with information about the AML Program Reauthorization. The AML Program provides the Bureau of Abandoned Mine Reclamation (BAMR) with the financial assistance needed to fix high priority issues in abandoned mine lands. These issues range in scope and severity, with affected areas in over 40 Pennsylvania counties, and impacting over 5,500 miles of streams. BAMR has addressed an average of 77 AML emergencies with an average construction cost of \$3.91 million per year since assuming the program from the Office of Surface Mining and Enforcement (OSMRE). Over the last five years, the number has risen to 86 AML emergencies per year, with an average construction cost of \$4.85 million per year. The amount of funding that the AML Program has received has decreased significantly, and the potential loss of the program presents significant economic, environmental, and public safety risks to the citizens of Pennsylvania. Of particular interest was Federal bill H.R. 4248 (Amendments to the Surface Mining Control and Reclamation Act (SMCRA)), which would do the following: 1) allow for the collection of fee revenue from active coal mining operations to fund federal AML programs to continue until 2036; 2) reimburse States for AML fees sequestered since 4 2013; and 3) require the Office of Surface Mining Reclamation and Enforcement (OSMRE) to reimburse States and tribal governments for costs of addressing AML emergencies. The authority to collect this fee is set to expire in September of 2021, without further extensions from Congress. The loss of that revenue would severely impact Pennsylvania's AML Program.

Alternative Bond System (ABS) Legacy Trust Agreements

PA DEP provided regular updates regarding the status of ABS Legacy Trust Agreements. These arrangements included bonds, fully-funded trusts and partially-funded trusts.

Annual Reports

The Board approved the MRAB Annual Reports for July 2017-June 2018 and July 2018-June 2019. Both reports will be revised prior to their submission to the General Assembly.

Bonding and Bond Rate Guidelines

PA DEP provided the Board with current numbers for grading and revegetation costs on 2020 bond rate guidelines, with emphasis on grading rates using low bid values vs. the three lowest bid values, also using several bids based on number of project bids. The new rates became effective on April 1, 2020, following publication in the *PA Bulletin* on March 7, 2020. Additionally, the idea of adding an additional grading rate category for haulage of spoil beyond 1,000 feet up to an arbitrary distance of around 1 mile was discussed. Data on reclamation projects involving haulage of spoil over 1,000 feet has been evaluated. The Reclamation

Committee met on September 25, 2019 to further discuss the elements of the Bond Rate Guidelines.

Bureau of Abandoned Mines Reclamation (BAMR) Projects/Status Report

Updates on reclamation projects were supplied by PA DEP's Bureau of Abandoned Mine Reclamation (BAMR). In the 2019 calendar year, there were 125 projects completed that reclaimed 169,998.1 acres, at a cost of \$20,305,685.00. As of March 2020, there was one project completed that reclaimed 0.1 acre, at a cost of \$19,040.00. For future completions, there are 60 contracts to reclaim 1,506.3 acres, at a cost of \$144,260.313.00. For future awards, there are 85 contracts to reclaim 1,545.9 acres, at a cost of \$167,222,413.00.

Coal Civil Penalties Technical Guidance Document (TGD)

PA DEP shared information about this TGD with the Board's RLT Committee at its March 16, 2020 meeting. The RLT Committee suggested revisions to this TGD, and PA DEP plans to meet with the RLT Committee for further discussions of the document.

Coal Refuse Disposal Regulations

PA DEP shared information about these regulations with the Board's RLT Committee at its March 16, 2020 meeting. The RLT Committee suggested revisions to these regulations, and these revisions are being incorporated into the regulatory document.

District Mining Offices (DMOs) Update:

PA DEP provided the Board with periodic updates on the activities of the DMOs (e.g., vacancies, workloads, processing of permit applications, management of overdue permit application approvals).

<u>E-Initiatives</u>: PA DEP provided the Board with updates on e-Initiatives, including Notice of Intent to Explore (NOI) e-permits, electronic discharge monitoring reports (eDMRs), mobile inspections and the distribution of inspection reports.

Field Trip

The MRAB holds an annual field trip. The 2019 field trip was held on July 17, 2019. The Board toured the following sites: *a)The Keystone Anthracite Marketing Corporation Mine Site*; *b) The No. 9 Mine and Museum (including a tour of the former underground coal mine)*; *c) The BET Associates IV, LLC (former Lehigh Coal and Navigation) Mine*; and *d) The Route 309 Active Mine Drainage Treatment System.* Feedback received from field trip participants was overwhelmingly positive.

Land Reclamation Financial Guarantees (LRFG)

PA DEP provided regular updates on this topic, in terms of the number of LRFG operators and permits, along with the amount of funding to underwrite the LRFG. Matters regarding the benefit of raising the LRFG limit and, the relationship between new permits and the LRFG were also discussed. The total amount underwritten for LRFG currently stands at \$48.7 million.

National Pollutant Discharge Elimination System (NPDES) Permitting

PA DEP provided regular updates on the NDPES draft mining permits sent to the United States Environmental Protection Agency (US EPA) for review. This is because the US EPA currently has oversight of the development of these permits. PA DEP is working to develop a guidance document and a permit template, all in order to address US EPA concerns.

Once these items are completed, US EPA may end its oversight of the PA DEP NPDES permitting program for mining permits. As of March 31, 2020, 973 draft NPDES permits have been sent to the US EPA; 556 of these were issued without comment, while 417 of these were issued with minor comments. Additionally, 3 there were no permits could be issued with comments (minor), while 28 more permits could be issued without comments. Lastly, there were 6 permits pending with possible comments and, 8 permits pending with no possible comments.

Non-Regulatory Agenda

PA DEP provided regular status reports on Technical Guidance Documents (TGDs), and reporting forms of the Mining Program, including; 1) the Engineering Manual; 2) E-Permitting 3) Surface Water Protection — Underground Bituminous Mining Operations; 4) Liners (Caps); 5) Civil Penalties; 6) Subchapter F; 7) Alkaline Addition; and 8) Biosolids.

OSM Program Consistency

PA DEP worked with the MRAB RLT Committee on this regulatory package. To date, this regulatory package was approved by Independent Regulatory Review Commission (IRRC) on January 31, 2020 and published.

Permit Applications

PA DEP provided regular status reports on coal mining permit application types in process at the District Mining Offices (DMOs) (i.e., pre-applications, new mines, major or minor permit revisions, completion reports, NPDES (individual and GP-104), renewals, blast plans, bond revisions, mid-term reviews, Government-Financed Construction Contracts (GFCCs), and transfers). Processing times for these permit application types in the DMOs was also provided.

Permit Decision Guarantee (PDG)

On a regular basis, PA DEP provided updates on this program in response to the PDG operations, development of Standard Operating Procedures (SOPs) and checklists, and, concerns regarding the backlog of permits in the system.

Reclamation Fee Operation and Maintenance (O & M) Trust Account

PA DEP provided regular updates on the status of the Reclamation Fee Account, in terms of: 1) coal civil penalties collected and interest earned; 2) additional revenue transactions; and 3) LRFG premiums and interest.

Regulatory Updates

PA DEP shared regular status reports on a variety of regulatory packages including: 1) Water Supply Replacement; 2) Coal Refuse Disposal; and 3) OSM Program Consistency.

Remining Financial Guarantees (RFGs)

PA DEP provided a historical overview of bond forfeitures, anticipated forfeitures, and their impacts on the Remining Financial Assurance Fund.

Revenues

PA DEP provided regular status reports on application fee revenues from two main sources: 1) Surface Mining Conservation and Reclamation Act (SMCRA); and 2) the Clean Water Fund (CWF).

Water Supply Replacement Regulations

PA DEP worked with the MRAB RLT Committee to revises these regulations (per Chapters 87, 88, 89 and 90). During its March 16, 2020 meeting, the MRAB RLT Committee voted to move these regulations to the full Board for consideration and, passed a motion to adopt them. The regulations are currently being modified to reflect minor changes from the RLT Committee, in order to enter the finalization process.

Appendix A

BYLAWS OF THE MINING AND RECLAMATION ADVISORY BOARD

As Amended December 12, 1996

ARTICLE I

Authorization

The Mining and Reclamation Advisory Board is authorized and organized pursuant to Section 18(g) of the Pennsylvania Surface Mining Conservation and Reclamation Act (Act 181 of 1984) as amended by Act 173 of 1992.

ARTICLE II

Purpose

The advisory Board is charged to assist the secretary to expend the funds for the purposes provided by this act and to advise the secretary on all matters pertaining to surface coal mining and reclamation which shall include, but not be limited to, experimental practices, alternate methods of backfilling, selection of reclamation projects, alternate reclamation methods, obligations for pre-existing pollution liability, alteration of reclamation loans, reclamation fees and bonding rates and methods.

ARTICLE III

Membership

The Board shall be comprised of three coal operators, two of whom shall be licensed bituminous surface mine operators and one of whom shall be a licensed anthracite surface mine operator; four public members from the Citizens Advisory Council, who shall be appointed by the council; two members, one from the Anthracite and Bituminous Licensed Professional Engineers, and one from the County Conservation Districts, who shall be appointed by the State Conservation District Commission; four members of the General Assembly, two from the Senate, one member from the majority party and one member from the minority party, who shall be appointed by the president pro tempore; and two from the House of Representatives, one from the majority party and one from the minority party, who shall be appointed by the speaker of the House of Representatives.

- A. Board members shall designate an alternate. The chairperson shall be notified, in writing, of such alternate.
- B. The Board may recommend to the appointing authority removal of any member not attending, or not represented by a designee, at two Board meetings in a year.

ARTICLE IV

Voting

Members, or designated alternates, shall be entitled to one vote, in person, on all matters that shall come before the Board. No voting shall be done without a quorum, unless otherwise indicated in these bylaws. A majority of the membership of the Board shall constitute a quorum.

ARTICLE V

Officers

The officers of the Board shall be a chairperson and a vice-chairperson.

The chairperson and vice chairperson shall by elected from the membership of the Board, as defined in the Pennsylvania Surface Mining Conservation and Reclamation Act, as amended, and may not be the secretary of the Department of Environmental Protection, or his designee. They shall hold office for a term of one year, or until a successor is elected.

It shall be the duty of the chairperson to preside at all meetings of the Board, call special meetings, prepare and distribute the meeting agenda and perform such other duties as pertain to the office.

It shall be the duty of the vice-chairperson to perform the duties of the chairperson in his/her absence.

ARTICLE VI

Administration

Administrative and clerical duties shall be performed by the Office of Mineral Resources Management, Department of Environmental Protection. A department staff person shall function as a recording and corresponding secretary. Included among these administrative duties shall be:

- A. To give timely notice of meetings of the Board and committees.
- B. To record full Board and committee meeting minutes and keep a permanent file. Board and committee meeting minutes shall be distributed to the full membership. Minutes should be reviewed by the chairperson or vice-chairperson prior to distribution.
- C. To conduct both outgoing and incoming correspondence and maintain a permanent file of such correspondence, and
- D. To perform such other duties as may be requested by the Board, including, but not limited to, travel arrangements, conference calls, etc.

In addition, staff representatives from the Office of Mineral Resources Management shall serve as staff liaison to the Board.

ARTICLE VII

Committees

The Board may establish committees to assist in performing its advisory duties.

- A. Committees shall be established by a majority vote of those members attending a regular or special meeting of the Board.
- B. The Board chairperson shall appoint committee members. The committee chairperson shall be selected by its members. The committee chairperson will be responsible for calling committee meetings, requesting needed assistance from DEP, and reporting to the Board, and shall receive necessary administrative and clerical support from DEP.
- C. Each committee shall develop and adopt a statement of purpose or objective of the committee at a meeting of that committee after its creation.
- D. The chairperson of the Board shall appoint a committee to prepare the Annual Report, as mandated by Section 18(g) of the Pennsylvania Surface Mining Conservation and Reclamation Act.
- E. A listing of the committees and their statements of purpose shall be maintained as an appendix to these bylaws. Changes to the appendix shall not constitute a change to the bylaws.

ARTICLE VIII

Meetings

The Board shall meet on the first Thursday of the months of January and July and the fourth Thursday of the months of April and October, unless changed by a majority of the members. Alternate meeting dates and special meetings shall be called by the chairperson, in consultation with the vice-chairperson. Committee meetings shall be called by committee chairpersons, who shall also notify the full Board.

ARTICLE IX

Participation by Non-Board Members

A. Formal Presentation

Any person may ask the Board for time on the formal agenda to present policy, regulatory or legislative concerns for the Board to consider. The request shall be made in writing to the chairperson and include a summary of the presentation. The chairperson shall determine the interest of the Board in the subject and decide if the presentation will be allowed during the formal agenda. Requests shall be submitted at least one month prior to a Board meeting.

B. Informal Discussion

At the discretion of the chairperson, any person present at the meeting shall be afforded the opportunity to speak to the Board or ask questions of Board members.

ARTICLE X

Amendments

The bylaws may be amended, repealed or suspended at any meeting of the Board by a two-thirds vote of the members of the Board, provided that written notice of such amendment, repeal or suspension shall have been sent to each member at least one week prior to said meeting.

ARTICLE XI

Board Representation

The Board shall act as a body in all matters before it and only the chairperson, or his or her designee, the vice-chairperson or the Board's designee shall speak on behalf of the Board.

Appendix B

OFFICERS OF THE BOARD FOR THE REPORTING PERIOD July 2019 – June 2020

Board Chairperson	David Osikowicz
Board Vice Chairperson	Robert Burns
Annual Report Committee Chairperson	Rachel Gleason
Policy Committee Chairperson	Mark Snyder
Reclamation Committee Chairperson	Duane Feagley
Regulation, Legislation and Technical Committee Chairperson	Jack Chamberlin



Appendix C

BOARD MEMBERSHIP FOR THE REPORTING PERIOD

July 2019 – June 2020

Board Member	Position	Alternate
David Osikowicz	Bituminous Surface Mine Operator	Rachel Gleason
Mark Snyder	Bituminous Surface Mine Operator	Darrel Lewis
Jack Chamberlin	Licensed Professional Engineer	Rachel Gleason
Robert Burns	Anthracite Surface Mine Operator	Duane Feagley
Sen. Patrick Stefano	General Assembly	Benjamin Wren
Sen. Steven Santasiero	General Assembly	Timothy Collins
Rep. Tommy Sankey	General Assembly	Glendon King
Rep. Pamela Snyder	General Assembly	Tara Hazelwood
John St. Clair	Citizens Advisory Council	Will Dando
James A. Schmid	Citizens Advisory Council	Keith Salador
Cynthia Carrow	Citizens Advisory Council	Keith Salador
Terry Dayton	Citizens Advisory Council	Keith Salador
Robert Hughes	State Conservation Commission/Eastern PA	Andy McAllister
	Coalition for Abandoned Mine Reclamation	
	(EPCAMR)	

Appendix D

MEETING DATES DURING THE REPORTING PERIOD July 2019 – June 2020

Date	Location	Meeting
July 18, 2019	Pottsville, PA	Full Board
September 25, 2019	Harrisburg, PA	Reclamation Committee
October 24, 2019	Harrisburg, PA	Full Board
January 23, 2020	Harrisburg, PA	Full Board
March 16, 2020	Skype Meeting Only	Regulation, Legislation and Technical Committee
April 2, 2020	Skype Meeting Only	Full Board
May 18, 2020	Skype Meeting Only	Regulation, Legislation and Technical Committee

Note: Meetings held on July 18, 2019; September 25, 2019; October 24, 2019; and January 23, 2020 were offered in both live and conference call/Skype formats. Meetings held on March 16, 2020; April 2, 2020 and May 18, 2020 were offered in conference call/Skype formats only, due to the COVID-19 emergency.

Appendix E

MRAB COMMITTEES FOR THE REPORTING PERIOD July 2018 – June 2019

Annual Report Committee

Rachel Gleason, Chairperson	Duane Feagley
Pennsylvania Coal Alliance	PA Anthracite Council
212 North Third Street	PO Box 138
Suite 102	Pottsville, PA 17901
Harrisburg, PA 17101	Tel: 717-737-9825
Tel: 717-233-7900, ext. 24	
Darrel K. Lewis	Tara L. Hazelwood
State Industries, Inc.	PA House of Representatives
P.O. Box 1022	104A East Wing
Kittanning, PA 16201	PO Box 202052
Tel: 724-548-8101	Harrisburg, PA 17120-2052
	Tel: 717-783-0411

Reclamation Committee

Duane Feagley, Chairperson
PA Anthracite Council
PO Box 138
Pottsville, PA 17901
Tel: 717-737-9825
Robert E. Hughes
EPCAMR
101 South Main Street
Ashley, PA 18706
Tel/Fax: 570-371-3522
Andy McAllister (Alternate)
WPCAMR
Green Forge Building
226 Donohoe Road, Suite 110
Greensburg, PA 15601
Tel/Fax: 724-832-3625