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Sent via e-mail and U.S. Mail

California District Mining Office
Department of Environmental Protection, District Mining Operations
Commonwealth of Pennsylvania
Attention: Joel Koricich, District Mining Manager, Jay Winter, Permit Chief, and Craig Burda, Mining Engineer
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Coal Center, PA 15423
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**Re: Supplemental Comment on Coal Refuse Disposal Area No. 8 Permit Application
30130701 and NPDES No. PA0236268
Noticed in 43 Pa.B. 6922 (Saturday, November 30, 2013)**

To Whom It May Concern:

The Center for Coalfield Justice (“CCJ”) submitted comments on Consol Pennsylvania Coal Company, LLC’s (“Applicant”) permit application for a new coarse coal refuse disposal facility at the Bailey Central Mine Complex in Morris Township, Greene County (“Application”) on January 3, 2014. The final public notice was published in the *Washington Observer-Reporter* on December 5, 2013. The relevant Pennsylvania Bulletin notice appeared as follows:

30130701 and NPDES No. PA0236268. Consol Pennsylvania Coal Company, LLC, (1525 Pleasant Grove Road, PO Box J, Claysville, PA 15323). To operate the Bailey Central Mine Complex—Coal Refuse Disposal Areas No. 7 and No. 8 in Morris Township, **Greene County** and related NPDES for the Coal Refuse Disposal No. 8 Area for coarse and fines refuse disposal. Application also includes a request for a Section 401 Water Quality Certification. Coal Refuse Disposal Support Acres Proposed 277, Coal Refuse Disposal Acres Proposed 272. Receiving Stream: Booth Run, classified for the following

use: WWF. The application was considered administratively complete on November 7, 2013. Application received September 6, 2013

On January 30, 2014, CCJ staff conducted a file review at the California District Mining Office. The comments presented below supplement those earlier comments.

1. The Applicant's public notice of its pending Application in just one local newspaper does not satisfy Section 6.1(h)(5) of the Coal Refuse Disposal Act.

Comment number five in CCJ's January 3, 2014 comment letter to the Department concerning the CRDA No. 8 permit application explained that public notice of a request for a variance from the 100-foot stream buffer zone restriction must appear in two local newspapers. CCJ also explained that this requirement is in addition to the four-week public notice requirement for permit applications. Section 6.1(h)(5) of the Coal Refuse Disposal Control Act (CRDCA) provides that "the operator shall be required to give public notice of his application for the stream variance in two newspapers of general circulation in the area once a week for two consecutive weeks."¹ In approving this provision of the CRDCA as part of Pennsylvania's regulatory program under the Surface Mining Control and Reclamation Act of 1977 (SMCRA), the Office of Surface Mining Reclamation and Enforcement (OSM) made it absolutely clear that Section 6.1(h)(5)'s "two-week newspaper notice is in addition to the four-week newspaper notices required by the approved program at § 86.31(a)."²

The only public notice of the pending Application that appeared in a newspaper was published once a week for four consecutive weeks in just one local newspaper, the *Washington Observer-Reporter*. As explain in CCJ's January 3, 2013 comment letter, that weekly notice for four consecutive weeks only satisfies the general requirement for public notice of permit applications.³ It does not, however, satisfy the distinct and additional requirement for publication in two local newspapers that applies to requests for variances from the 100-foot stream buffer zone restriction.⁴

As of January 30, 2014 when CCJ reviewed the permit application file for CRDA No. 8, it appeared that the Department had not done anything to require the Applicant to publish public notice of its request for a stream variance in a second local newspaper. In fact, it appears that the Department has no intention of requiring the Applicant to

¹ 52 P.S. § 30.65a(h)(5); 25 Pa. Code 90.49(c)(2) (emphasis added).

² 63 Fed. Reg. 19801, 19814 (col. 1) (April 22, 1998), See also *Id.* at 1906-1907 ("Subsection 6.1(h)(5) also requires public notice in two newspapers of general circulation in the area of the proposed variance for two successive weeks. This notice would be in addition to the public notice required by § 86.31 concerning public notices of filing of permit applications and is consistent with the notice required for stream buffer zone variance applications at 25 Pa. Code § 86.102(12)").

³ 52 P.S. § 30.55(i), 25 Pa. Code § 86.31(a)

⁴ 52 P.S. § 30.65a(h)(5); 25 Pa. Code 90.49(c)(2)

adhere to this unambiguous requirement. In an e-mail dated January 15, 2014, Mr. Burda stated that public notice in one newspaper for four weeks is sufficient “as previously established when [the Department] received objections in the past.”

It would be ridiculous for the Applicant not to comply with this unambiguous and minimal requirement of providing notice in one additional newspaper for just two consecutive weeks, especially for a project of this magnitude. It would be just as unreasonable for the Department not to insist on adherence to a requirement that is obvious based on the language of Section 6.1(h)(5) and unquestionably recognized by OSM. It is unclear why the Department has not required compliance with this public notice requirement in past and why the Department now wants to rely on this flawed past practice to avoid requiring adequate public notice by the Applicant. Regardless of the reason, a failure to provide adequate public notice would implicate the Office of Surface Mining’s oversight jurisdiction, as it would be a violation by both the Applicant *and* the Department.

2. Issuing the permit for proposed CRDA No. 8 without accounting for the impacts associated with proposed CRDA No. 7 would not only be imprudent, but also contrary to existing law.

Comment number three in CCJ’s January 3, 2014 comment letter to the Department concerning the CRDA No. 8 permit application highlighted the Applicant’s failure to address the cumulative adverse impacts of all of the underground mining and coal refuse disposal activities associated with the Bailey, BMX, and Enlow Fork Mines. CCJ explained that the Applicant’s discussion of cumulative impacts, which was limited to the impacts of proposed coal refuse disposal area No. 8, must be expanded to include all direct and indirect impacts resulting from past and currently proposed activities, and foreseeable impacts from known or anticipated future activities.

The Department’s regulation establishing the criteria for permit approval or denial prohibits the Department from issuing a permit unless the Applicant affirmatively demonstrates and the Department finds, in writing, that the assessment of the probable cumulative impacts of all anticipated coal mining activities in the general area on the hydrologic balance has been made and the proposed activities have been designed to prevent damage to the hydrologic balance outside the proposed permit area.⁵ In order to adequately assess the probable cumulative impacts of all anticipated coal mining activities, which include coal refuse disposal, in the general area on the hydrologic balance, both the Applicant and the Department must, at the very least, account for the impacts associated with proposed CRDA No. 7.

A. The Department’s notice in the Pennsylvania Bulletin makes clear that the Department does not consider CRDA Nos. 7 & 8 to be distinct projects.

⁵ 25 Pa. Code §§ 86.37, 86.37(a)(4)

As noted in CCJ's January 3, 2014 comment letter, the Department's notice public notice of its receipt of the Application in the *Pennsylvania Bulletin* described the Application as seeking a permit to operate the Bailey Central Mine Complex Coal Refuse Disposal Areas No. 7 and No. 8. Section 86.31(c) requires the Department to provide public notice of every "complete application" for surface mining activity, which includes coal refuse disposal.⁶

Despite the fact that the Applicant's public notice in the *Washington Observer-Reporter* was limited to the permit application for CRDA No. 8, the Department chose to publically notice the permit applications for CRDA Nos. 7 and 8. Even more significant, when CCJ staff conducted a file review on December 10, 2013 at the California District Mining Office, we were informed that the permit application for CRDA No. 7 was not complete. Therefore, the Department disregarded its duty to publically notice complete applications when it decided to notice the incomplete permit application for CRDA No. 7 in addition to the complete permit application for CRDA No. 8.⁷ Since both the Department and the Applicant considered CRDA Nos. 7 and 8 to be one single project in the Applicant's Alternatives Analysis, it is unclear why the Department accepted the Applicant's conflicting public notice or why the Department deemed the permit application administratively complete without a complete application for CRDA No. 7. Regardless, the Department's public notice categorizes CRDA Nos. 7 and 8 as one proposal.

CCJ's previous comment letter explained that the Department's November 30, 2013 notice was defective because it was contrary to the Department's duty under 25 Pa. Code § 86.31(c) to provide public notice of complete applications. As a result, CCJ requested that the Department take immediate steps to remedy its error. Since the Department has not published a revised public notice we can only assume that the Department considers the proposed CRDA Nos. 7 and 8 to be one single project, rather than two distinct proposals. Therefore, the Department cannot issue the permit for CRDA No. 8 without accounting for the impacts associated with CRDA No. 7.

B. The Applicant's Site Selection and Alternatives Analysis Study defines Alternative 2 as the combination of proposed CRDA Nos. 7 and 8.

CCJ already explained the shortcomings of the Applicant's cumulative impacts analysis in comment number three of its January 3, 2014 comment letter to the Department. Most notably, the analysis of cumulative impacts completely ignores the impacts associated with proposed CRDA No. 7 despite the fact that the Applicant refused to consider each of these sites as distinct alternatives in its Alternative Analysis and Site Selection Study. The Applicant could not have been more clear that Alternative 2 consisted of both site 3a and site 4: "Neither Site 3A nor Site 4 are standalone

⁶ 25 Pa. Code § 86.31(c)

⁷ 25 Pa. Code § 86.31(c)

alternatives for a reasonable service life for CCR and FCR disposal. Only by combining site 3A and 4 can a reasonable service life for both CCR and FCR disposal be obtained, while averting foreseeable impacts to several more sites.”⁸

As of January 30, 2014, when CCJ staff conducted another file review at the California District Mining Office, the permit application for proposed CRDA No. 7 had still not been submitted. Surprisingly, the Department appears to be moving forward with the permit review process for proposed CRDA No. 8 without any of the application materials for proposed CRDA No. 7.

C. The Department cannot issue the permit in the absence of the requisite cumulative adverse impacts analysis and mitigation plan for Alternative 2.

The posture of the pending CRDA No. 8 permit application contradicts the Applicant’s Alternatives Analysis and Site Selection Study. Despite the fact that the Applicant was unwilling to consider each of these sites as distinct alternatives in its Alternative Analysis and Site Selection Study, it now wants to evaluate the impacts separately. Even more alarming, it appears that the Department may be willing to issue the permits separately without requiring the Applicant to evaluate the collective hydrologic impacts of Alternative 2. The Department’s regulations governing coal refuse disposal are structured to prevent such a result.

i. The Coal Refuse Disposal Control Act and associated regulations establish a two-step permitting process for coal refuse disposal activities.

The Department itself has interpreted the Coal Refuse Disposal Control Act and associated regulations as establishing a two-step permitting process. “The CRDCA and the proposed regulations establish a two-step process for the permitting of coal refuse disposal sites. The first step is a pre-application site selection process...with the goal of choosing the site that results in minimal adverse impacts. Following the Department’s approval of the applicant’s site selection, the applicant proceeds to the second step, which involves preparing and submitting a permit application for the selected site.”⁹

The Applicant framed its entire site selection analysis, the first step in the permitting process, based on the combined capacity of CRDAs Nos. 7 & 8.¹⁰ Since the Applicant’s Alternatives Analysis and Site Selection Study defined the preferred Alternative 2 as

⁸ Alternatives Analysis and Site Selection Study at 7-1.

⁹ 31 Pa.B. 3735; See Also 52 P.S. § 30.54a; 25 Pa. Code § 90.5

¹⁰ The Applicant’s alternatives analysis concludes: “Alternative 2, consisting of sites 3A and 4, is the new disposal area recommended for development. This new disposal area will provide over 15 years of disposal capacity at the currently projected waste generation rates.”

sites 3a and 4, and the Department accepted Alternative 2 as defined, neither the Applicant nor the Department can treat these sites as distinct alternatives in the second step of the permitting process. The site selection process is a mandatory first step and the Application must be based on the approved alternative. Therefore, the Department is prohibited from issuing a permit for CRDA No. 8 without fully considering the impacts of proposed CRDA No. 7. This necessarily requires more than the cursory review of impacts provided in the Alternatives Analysis and Site Selection Study.

ii. The Applicant and the Department are required to address the probable hydrologic consequences of the proposed coal refuse disposal activities on the proposed permit area and adjacent area. CRDA No. 7 is not only proposed by the Applicant in its Alternatives Analysis and Site Selection Study, it is also adjacent to CRDA No. 8.

Surface mining laws make adherence to water quality concerns integral to the permitting process. SMCRA requires that each permit application “include a description of the existing, pre-mining environmental resources within the proposed permit area and adjacent areas that may be affected or impacted” by the proposed activities.¹¹ In their permit application operators must determine the “probable hydrologic consequences (PHC) of the proposed operation upon the quality and quantity of surface and groundwater...for the proposed permit and adjacent areas.¹² The regulatory authority must then “provide an assessment of the probable cumulative hydrologic impacts of the proposed operation and all anticipated mining upon surface- and ground-water systems in the cumulative impact area” to determine “whether the proposed operation has been designed to prevent material damage to the hydrologic balance outside the permit area.”¹³

The Pennsylvania coal mining regulations require the Department to evaluate potential cumulative impacts of proposed refuse disposal sites in combination with mines and other facilities in affected watersheds. Section 86.37(a)(4) requires a cumulative hydrological impact assessment. Section 86.37(a)(4) provides:

“permit application will not be approved unless the application affirmatively demonstrates and the Department finds, in writing, on the basis of the information in the application or form information otherwise available, which is documents in the approval, and made available to the applicant, that...the assessment of the probable cumulative impacts of all anticipated coal mining in the general area in the hydrologic balance as

¹¹ 30 C.F.R. § 779.11 (2012)

¹² 30 C.F.R. § 780.21(f)(1)

¹³ 30 C.F.R. § 780.21(g)(1) (2012)

described in...§ 90.35...has been made by the Department, and the activities proposed under the application have been designed to prevent material damage to the hydrologic balance outside of the proposed permit area.¹⁴

OSM has made it clear that Section 90.35(c), concerning coal refuse disposal and protection of the hydrologic balance, “provides that an application must contain a determination of the probable hydrologic consequences of the proposed coal refuse disposal activities on the proposed permit area and adjacent area.”¹⁵ In this case, there is no question that the analysis of the probable cumulative impacts of the proposed coal refuse disposal activity must, at an absolute minimum, include the impacts anticipated and associated with proposed CRDA No. 7.¹⁶

First, since the CRDCA and the associated regulations create a two-step permitting process where the application is dependent upon the pre-application site selection, there is no question that CRDA No. 7 is part of the proposed coal refuse disposal activities.¹⁷ The Applicant explicitly included the disposal area for proposed CRDA No. 7 in the prerequisite Alternatives Analysis and Site Selection Study and the Department approved Alternative 2 as including both sites. Therefore, CRDA No. 7 is part of the proposed permit area.¹⁸

Second, even if the Department decided not to treat proposed CRDA No. 7 as part of the proposed permit area; the required cumulative impacts analysis does not change. Section 90.35(c) requires the Applicant to submit “a determination of the probable hydrologic consequences of the proposed coal refuse disposal activities on the proposed permit area and adjacent area.”¹⁹ The regulations define the term adjacent area as “land located outside the permit area, where air, surface or groundwater, fish, wildlife, vegetation or other resources protected by this chapter may be adversely impacted by coal refuse disposal activities.”²⁰ In this case, the Applicant defined Alternative 2 as “adjoining valleys designated as Sites 3A and 4 at the northeast end of the search area.”²¹ “Adjacent means that objects or parcels of land are not widely separated, though perhaps they are not actually touching; but adjoining means that they are untied so closely that no other object comes between them.”²² Since the two sites proposed for CRDA Nos. 7 and 8 are adjoining, there is no question that they are adjacent. As a result,

¹⁴ 25 Pa. Code § 86.37(a)(4); 63 Fed. Reg. 19801, 19817 (col. 3) (April 22, 1998)

¹⁵ 25 Pa. Code § 90.35(c); 63 Fed. Reg. 19801, 19817 (col. 3) (April 22, 1998)

¹⁶ 25 Pa. Code § 86.37(a)(4); 25 Pa. Code § 90.35; 63 Fed. Reg. 19801, 1917 (col. 3) (April 22, 1998)

¹⁷ *Id.*

¹⁸ *Id.*

¹⁹ 25 Pa. Code § 90.35(c) (emphasis added); 63 Fed. Reg. 19801, 1917 (col. 3) (April 22, 1998)

²⁰ 25 Pa. Code § 90.1

²¹ Alternatives Analysis and Site Selection Study at 5-6.

²² West’s Encyclopedia of American Law, edition 2 (2008)

the Department must comply with its mandatory duty to evaluate the cumulative hydrologic impacts of CRDA No. 7 in its review of the Application for proposed CRDA No. 8.

* * *

The Applicant's cumulative impacts analysis is severely flawed. Because the Application does not contain an adequate cumulative impacts analysis, the Applicant has not met the requirements of 25 Pa. Code § 90.35(c). The Department must fulfill its non-discretionary duty to evaluate the probable cumulative hydrologic impacts of the proposed coal refuse disposal activities on the proposed permit area and the adjacent area.²³ The Permit cannot be issued unless the requirements of 25 Pa. Code § 90.35(c) and 25 Pa. Code § 86.37(a) are met.

3. The Applicant's mitigation plan is unlawfully inadequate because it does not ensure that the functions and values of aquatic resources affected by the direct loss of 29,100 linear feet of headwater streams and 7.73 acres of wetland will be replaced, and it does not account for the hydrologic impacts resulting from all underground mining and coal refuse disposal operations.

The Applicant's mitigation plan for the impacts associated with CRDA No. 8 is deficient because it does not address the cumulative impacts of all existing and planned underground mining and disposal activities. In fact, the proposal to purchase banking credits does not even ensure mitigation for the destruction of more than 29,100 linear feet of headwater streams and 7.73 acres of wetland as a result of proposed CRDA No. 8. The current mitigation plan does not identify any opportunities for wetland or stream mitigation within the impacted watersheds that will replace the lost functions of the destroyed wetlands and streams. As pointed out by the Pennsylvania Fish and Boat Commission in a letter dated January 10, 2014, the banking company that the Applicant proposes to use "has not developed any approved mitigation area for impacts associated with this proposed CRDA."

Fortunately, the Pennsylvania Fish and Boat Commission is not alone in questioning the adequacy of the Applicant's proposed mitigation plan. In a deficiency letter issued on January 15, 2014, the Department asked the Applicant to provide a "comprehensive stream and wetland mitigation plan to offset the function and values of the streams and wetlands anticipated to be affected by the construction of the proposed coal refuse disposal area." CCJ commends the Department for identifying this deficiency and appreciates the Department's efforts to address this deficiency with the Applicant. However, CCJ still has serious concerns about the Applicant's proposed mitigation plan that have not been adequately addressed.

²³ 25 Pa. Code §§ 90.35(c); 25 Pa. Code § 86.37(a)

First, the Department's deficiency letter does not ask the Applicant to submit materials related to CRDA No. 7. Again, this is inconsistent with the CRDCA and the associated regulations. The stream and wetland mitigation measures must be revised to address the entire proposed refuse disposal area. Since the Applicant proposed and the Department approved an alternative that included CRDA No. 7 and CRDA No. 8 in the first step of the permitting process, there is no question that CRDA No. 7 is part of the proposed refuse disposal area. The entire proposed refuse disposal area encompass 996 acres of forest and pasture land, and covers 58,970 linear feet of stream and 9.68 acres of wetland.²⁴ The mitigation plan must adequately replace the functions and values of aquatic resources affected by the direct loss of 58,970 linear feet of stream and 9.68 acres of wetland within the Boothe Run and Enlow Fork watersheds.

Second, the mitigation plan does not address the cumulative impacts within the Enlow Fork watershed, which contains the Enlow Fork, BMX, and Bailey Mines, as well as five existing coal refuse disposal areas resulting from valley fills – two slurry impoundments (Disposal Area Numbers 1 and 3) and three coarse coal refuse disposal areas (Disposal Area Numbers 2, 4 and 5). The cumulative impacts assessment must evaluate the impacts to Boothe Run and the Enlow Fork Watershed.

Third, the Applicant's Alternatives Analysis and Site Selection Study indicates that several other sites in the area will need to be developed when additional capacity is needed. In its Alternatives Analysis and Site Selection Study, the Applicant states that the combined capacity of CRDA No. 7 and CRDA No. 8 will allow for approximately 13.6 years of coarse coal refuse disposal and 15.5 years of fine coal refuse disposal at current waste production rates.²⁵ The Applicant also states that the amount of coal currently available at the Bailey and Enlow Fork Mines "represents approximately 40 years of additional coal production."²⁶ The applicant estimates that 16.3 million tons of coal refuse will be produced each year.²⁷ If the Applicant's estimates are accurate, then approximately 652 million tons of coal refuse will require disposal over the next 40 years. Given past, present, and future mining in the area, the cumulative loss of these aquatic resources and wildlife habitat is a significant concern and must be accounted for when identifying appropriate mitigation measures.

* * *

The Applicant's mitigation plan must be entirely revised or the Application should be denied. An adequate mitigation plan is particularly important considering the magnitude of the aquatic resource impacts from this proposed project, past impacts from the Applicant's coal refuse disposal and mining activities, and future impacts

²⁴ Alternatives Analysis and Site Selection Study at 6-19; *Id.* at 6-7.

²⁵ Alternatives Analysis and Site Selection Study at 5-6.

²⁶ Alternatives Analysis and Site Selection Study at 3-1.

²⁷ *Id.*

anticipated by the Applicant. The scope and significance of the necessary revisions merit a second public comment period.

4. The 30-day comment period that was triggered by the public notice does not provide the public with a meaningful opportunity to review and comment on the version of the Application upon which the Department will base its final determination.

In order for the public to have a meaningful opportunity to be heard on a permit application, it must be able to review and comment on the version of the application that Department's decision to issue or deny the permit will ultimately rest. As explained in CCJ's previous comment letter, this is particularly important because the proposed activity is located in an Environmental Justice area. As a result, this Application requires heightened public participation and scrutiny during the permit review process. The Department cannot accept public input on one version of a permit application and base its decision on a significantly different version submitted after the public comment period has closed. The Application and related documents currently available to the public are missing critical components.

First, in order to provide the public with the required opportunity to be heard at a meaningful time and in a meaningful manner, the Department cannot move forward with the permitting process for CRDA No. 8 until it receives the Applicant's complete application for CRDA No. 7. Since the Applicant proposed and the Department approved Alternative 2 as the combination of sites 3a and 4, the public must be given the opportunity to evaluate the application materials for the entire alternative.

Second, it is clear that if the Applicant expects to obtain permits authorizing the construction and operation of coal refuse disposal areas 7 and 8, it will have to replace current version of its cumulative impacts analysis in its permit application. The analysis of cumulative impacts is a central component of the Department's evaluation of the permit application.²⁸ The Department must require the Applicant to revise its cumulative impacts analysis to address the probable cumulative impacts of all anticipated coal mining activities in the general area on the hydrological balance.²⁹ At a minimum that analysis must include the impacts of: existing CRDA Nos. 1-5 and all of the impacts associated with them; the existing and future impacts of the underground longwall mining operations in the Bailey, BMX, and Enlow Fork Mines; any additional CRDAs that the Applicant will have to site, permit and construct in order to provide the additional coal refuse disposal capacity needed for future mining; and all of the impacts associated with the construction, operation, maintenance, and restoration of CRDA Nos. 7 & 8.

²⁸ 25 Pa. Code § 86.37(a)(4)

²⁹ 25 Pa Code § 86.37(a)(4); 25 Pa. Code § 90.35(c); 63 Fed. Reg. 19801, 1917 (col. 3) (April 22, 1998)

Third and finally, the mitigation plan must be completely revised based on the revised cumulative impacts analysis. Obviously, CCJ and the general public cannot provide meaningful comment on a mitigation plan that has not yet submitted.

Once the Applicant has submitted all of these documents, the Department must provide another public notice of the availability of these critical documents and give the public a reasonable opportunity to review and comment on those documents. Any public hearing or informal conference on the pending Application should be held only after the public has had a reasonable opportunity to review the all of the application materials.

5. Conclusion

The Application is severely flawed. The Department should return it to the Applicant. If the Application is not returned, the Department should issue the appropriate deficiency letters to the Applicant in light of CCJ's January 3, 2014 comment letter, this comment, and its own evaluation. Due to the significant revisions that would be necessary and the fact that the proposed activity is located in an Environmental Justice Area, the Department should make available for a second public comment period the next version of the Application. Again, CCJ would be willing to meet with the Department and the Applicant (and respective counsel if necessary) in order to discuss what more can be done to ensure the minimum level of protection required for the surrounding community, and for wildlife and the environment.

Respectfully submitted by,



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