



Pennsylvania Coal Association

212 North Third Street • Suite 102 • Harrisburg, PA 17101

(717) 233-7900
(800) COAL NOW (PA Only)
(717) 231-7610 Fax

GEORGE ELLIS
President

September 18, 2001

2001 SEP 25 10:07:50
REVISION CONTROL

Original: 2207

Environmental Quality Board
P.O. Box 8477
Rachel Carson State Office Building
Harrisburg, PA 17105-8477

Re: Comments and One-Page Summary of Pennsylvania Coal Association: Notice of Proposed Rulemaking: Coal Mine Permits/Road Requirements, 25 Pa. Code Chapters 86-88 and 90, Pennsylvania Bulletin, August 18, 2001

Members of the Board:

Thank you for giving the Pennsylvania Coal Association (PCA) an opportunity to submit written comments on above-referenced Notice of Proposed Rulemaking (the "Proposed Rulemaking"). PCA represents 28 bituminous coal producers and 88 associate member companies who work with and support the mining industry. Our members are directly and substantially interested in the subject matter of the proposed rulemaking.

PCA submits these written comments in response to the above-referenced Notice of Proposed Rulemaking. We ask that our single page of comments be distributed to Board members in lieu of a one-page summary.

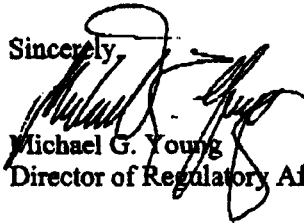
Proposed Amendment to 25 Pa. Code §86.37, Criteria for Permit Approval or Denial

PCA supports the proposed regulatory amendment, which is necessary to the efficient permitting of surface coal mining operations. The Mining and Reclamation Advisory Board has recommended approval of the proposed regulatory change. Additionally, the federal Office of Surface Mining Reclamation and Enforcement reviewed the proposed language and had input in the development of the revision.

Proposed Amendments to 25 Pa. Code §§87.160(a), 88.138(a), 88.231(a), 88.335(a) and 90.134(a), Haul Roads and Access Roads.

PCA also supports these proposed amendments, which are consistent with federal law and requirements. The amendment will simply reflect the current responsibilities for maintenance of roads which remain as part of the postmining land use, with the consent of the surface landowner.

Thank you for considering these comments. We would like a copy of the final form rulemaking when it is available.

Sincerely,

Michael G. Young
Director of Regulatory Affairs

