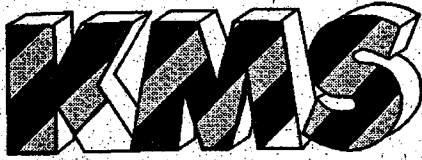


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Keystone Mining Services, LLC

Services:

- Ground Control Engineering
- Finite Element Analysis
- Underground Inspection
- Stratascope Services
- Roof Support Design

JOHN C. STANKUS, Ph. D.
President

An Affiliate of Jenmar Corporation

RECEIVED

February 4, 2010

FEB - 9 2010

Environmental Quality Board
Rachel Carson State Building, 16th Floor
400 Market Street
Harrisburg, Pennsylvania 17105-2301

ENVIRONMENTAL QUALITY BOARD

Re: Objection to Chapter 95 revisions to effluent standards for total dissolved solids, sulfates & chlorides

To Whom It May Concern:

Please be advised that I am adamantly opposed to the revised effluent standards proposed in Chapter 95 of the Pennsylvania Code for the following reasons:

1. Most importantly to me, the proposed regulations have the potential to cause the loss of thousands of stable mining jobs, mine included. My family depends on the mining industry.
2. The PA DEP based its request for rule change on marginal and incomplete data. There is no data to show a real sustained threat to streams.
3. EPA data for the south Pittsburg mile point 4.5 monitoring station on the Monongahela River shows that sulfate and chloride levels were never above 180 mg/l for the past 10 years.
4. Monitoring of the Monongahela River conducted at the Pennsylvania - West Virginia state line between 1999 and 2006 showed declining trends in chlorides, sulfates and TDS.
5. PA DEP did not perform an economic impact analysis of the proposed strategy.
6. Treatment options are not cost-effective and would cause serious negative economic impacts, including loss of jobs within companies directly and indirectly affected by Pennsylvania regulations.
7. Bonding will cost millions, as will land acquisition and site development necessary for treatment plants.
8. The proposed reverse osmosis technology will cost the mining industry billions of dollars in capital, and millions of dollars each year for operation and maintenance.
9. Large amounts of power will be needed to reduce billions of gallons of wastewater to a solid. Energy usage will increase dramatically, costing millions of dollars. Hundreds of thousands of tons of residual solid waste will be generated each year. The proposed regulations do not address waste disposal. If not evaporated to a solid, billions of gallons of residual concentrated brine may result.
10. There will be additional costs to treat abandoned discharges and discharges on sites with no active mining, including discharges treated under trust funds.

The proposed regulations should be withdrawn and all issues and potential impacts should be considered.

The proposed regulations could result in the loss of thousands of jobs, mine included.

Very truly yours,

KEYSTONE MINING SERVICES, LLC

John C. Stankus, Ph. D.
President

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