



## GLACIAL SAND & GRAVEL Co.

P.O. Box 1022, Kittanning, PA 16201 • Phone Kittanning 724-548-8101  
Plants in Bridgeburg, Tarrtown and Slippery Rock

concrete and  
masonry  
sands  
and gravel



VIA ELECTRONIC TRANSMISSION  
[RegComments@state.pa.us](mailto:RegComments@state.pa.us)

2864

September 24, 2010

Environmental Quality Board  
P.O. Box 8477  
Harrisburg, PA 17101-2301

RE: 25 PA Code CH. 77  
Noncoal Mining Fees

Dear Board Members:

Glacial Sand & Gravel Company has been a producer of noncoal minerals in the State of Pennsylvania since 1948, and would like to exercise its ability to comment on the proposed fee increases for noncoal mining permits as published in the August 28, 2010 *Pennsylvania Bulletin*.

A departmental audit should be conducted by an independent third party consultant to determine the Department's efficiency in reviewing and issuing Large Noncoal permits with input from both the industry and the DEP. Inefficient processes could be identified and either streamlined or eliminated, thus saving the Commonwealth and subsequently, taxpayers, unnecessary expenditures.

The operation of the Bureau of Mining and Reclamation program is a basic function of the state government which should be funded by the Commonwealth. Review costs beyond a standard set of guidelines generated by overzealous public comment should be solely born by the Commonwealth or the requestor. These expenses, which significantly drive up the cost of permitting, should not be used as an avenue to delay the process or place an onerous burden on the permit applicant.

The proposed fee structure is neither realistic nor justified. While the current \$250 fee may be antiquated, a 100 fold increase is exorbitant. A fee structure in the \$1,500-\$2,500 range for a Large Noncoal Permit would reflect a 600-1000 percent increase and be more palatable to industry.

Thank you for the opportunity to express our position on this important issue.

GLACIAL SAND & GRAVEL COMPANY

Karl C. Fatter, P.E.  
Mining Engineer

KCF/kif

RECEIVED  
IRRC  
2010 SEP 27 P 2:17

Cooper, Kathy

2864

**From:** Karl Fatter [Karl.Fatter@snydercos.com]  
**Sent:** Friday, September 24, 2010 1:27 PM  
**To:** EP, RegComments  
**Subject:** Proposed non coal mining permit fees  
**Attachments:** LNC permit fee increase opposition.pdf

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IRRC

2010 SEP 27 P 2:17

Glacial Sand & Gravel Company's comments on the proposed fee increases for non coal mining permits as published in the August 28, 2010 *Pennsylvania Bulletin* are expressed in the attached correspondence.

Thank you,

Karl C. Fatter  
Glacial Sand & Gravel Company  
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Fax: 724-545-8259