

Some musings on the future Title IV Funding in PA

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- 1) Do all Priority 1's. With respect to the Priority 2 inventory of projects, the DEP should
 - a) further update and prioritize those projects with respect to value to the Commonwealth.
 - b) implement an AMR implementation schedule based on the Priority 2 sub-prioritization, anticipating some probability of having inadequate resources to accomplish the entire inventory.
 - 2) Take full advantage of the new 30% set-aside provision for AMD by requesting the full 30% annually, allowing for a divergence by taking a lesser percentage only in exceptional situations. (The set-aside money becomes state money that can earn interest and is not subject to time limitations for usage.) Further, because of the rules of certification, it behooves PA to delay certification, if not forego it, to extract the maximum funding possible from Title IV. Taking the entire 30% achieves this objective.
 - 3) Advance a comprehensive policy on the wise use of the 30% set-aside funding including:
 - a) Revisiting and being guided by the principals in "Pennsylvania's Comprehensive Plan for Abandoned Mine Reclamation", perhaps with some tweaking.... Adjusted to suit times.
 - b) Allowing Operations & Maintenance activities for treatment systems to be funded so the systems can operate into the foreseeable future (including strategies that will allow optimal use of funding for the greatest overall benefit, e.g. establishment of trust funds, establishment of BAMR "BD" crews that provide maintenance services and technical services, laboratory analyses of water samples, quick response programs.)
 - c) Encouraging the use of the most appropriate technologies (to include both active and passive elements, in-stream dosing), in a given situation by performing cost/benefit analyses for various treatment strategies and optimizing short term and long term costs with reliability.
 - d) Encourage research and development of promising treatment methodologies through demonstration projects.
 - e) Establishing engineering standards (perhaps performance standards) when funding (passive treatment) systems.
 - f) Chemically monitoring systems post construction.
 - g) Requiring proper characterization of AMD discharges (generally at least 2 years of monitoring) prior to committing to final design and construction of systems.
 - h) Prioritizing AMD projects with respect to value to the Commonwealth.
 - i) Implementing AMD projects with respect to value to the Commonwealth.
 - j) Perhaps establishing a competitive grants program encouraging local watershed groups' participation in sponsoring reclamation projects where monies may be leveraged (not a substitute for state funding, e.g. GGx.)
 - k) Expanding BAMR's in-house capabilities with respect to being able to select, develop, and implement AMD projects; gearing-up for large influx of funding, and using outside consulting and construction.
 - l) Emphasizing AMD Source Abatement wherever possible as a generally superior alternative to treatment of AMD.
 - m) Working cooperatively with industry whose economic and civic interests dovetail with reclamation interests.
- Related - Developing overhauled 105 permitting so it is uniform across the Commonwealth and which recognizes the inherent value of reclamation projects by removing non-productive obstacles.