# Coordinated Application Process and Coordinated Post Reclamation Assessments in Ohio

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#### Ohio Coal Coordination

**Coordinated Application Process** 

**ODNR-DMRM-Permitting** 

**OEPA-401 Coordinator** 

**USACE-Regulatory** 

**USEPA** 

**USFWS** 

**Applicant** 

**Applicant's consultant** 

**Coordinated Post Reclamation Assessments** 

**USACE-Regulatory** 

**ODNR-DMRM-Inspectors** 

**OEPA-401 Compliance personnel** 

## History of Integrated Process

- IAP in 2005-intent was to combine all applications into one 404/401/SMCRA
  - Difficulties due to differences in regulations
  - Difficulties understanding who regulates what
  - Tremendous amount of unnecessary paperwork and workload added to each agencies review
  - Lasted about 3 years
  - Great learning experience

#### Kaizen

- Dissected the IAP to make it better
- Decision was made to scrap the IAP

- CAP-Coordinated Application Process
  - Return to agency specific application process
  - Overlapping but not identical review

#### CAP

- Joint field review
  - Determination of jurisdiction USACE
    - JD map becomes part of SMCRA application
  - Identification of high quality resources –OEPA
  - Identification of developed and undeveloped spring sources-ODNR-DMRM permitting staff
  - USFWS, USEPA, Applicant, Consultant
- Technical Review
  - Discrepancies in applications
  - Mitigation Review

#### Joint Review Benefits

In the field Open discussion of high quality resources Identify areas for avoidance Identify potential difficult areas for construction/reclamation purposes....slips **During review** Ensure big ticket items are the same coal tonnage, mine sequence, permit area Monitoring points selected for dual usage END RESULT-SMCRA/404/401 permits are not the same but do not contradict one another

#### **Detriments**

- Scheduling can be difficult
- Did I mention that scheduling can be difficult?

## Third Tuesday Meetings

- Opportunity for industry to meet with regulatory agencies
  - Discuss ongoing projects
  - New projects
  - Compliance issues
  - Program issues
  - Open forum for transparency

## Quarterly Coal Meetings

- Hosted by ODNR-DMRM
- USACE, OEPA, USEPA, USFWS, OSM, Industry
- Well attended by Ohio Coal Association
- Consultants
- Pulse check on how processes are flowing
- Another forum for industry specific issues

## Coordinated Field Inspections with Coal Mining and Reclamation Inspectors

Identified a need for fluent communication between coal reclamation inspectors and regulatory personnel

#### Goals

- Improve our understanding of one another's programs which will improve our ability to identify issues and problem solve in a more efficient and cohesive manner
- Identify and correct compliance issues early when chance of immediate correction is high
- Avoid asking industry to achieve conflicting goals and/or make on site modifications that would jeopardize compliance under any program
- Aid industry in achieving compliant reclamation and successful stream and wetland mitigation

## Our Approach

Share information

• Train in the classroom

• Train in the field

Coordinate future inspections

## Joint Field Inspections

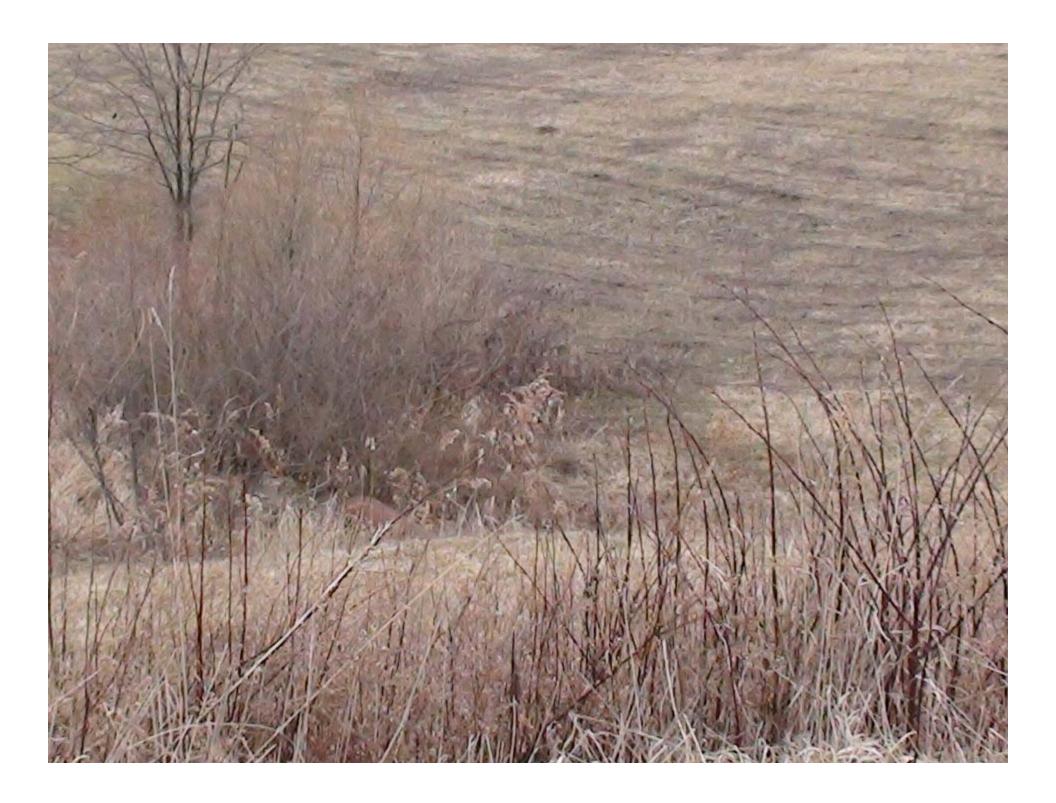








































## Where do we go from here?

More training

Refine the process

Continue joint field work

