



**OFFICE OF SURFACE MINING
RECLAMATION AND ENFORCEMENT**

Annual Evaluation Summary Report

for the

**Regulatory and Abandoned Mine Land Reclamation
Programs**

**Administered by the State
of**

ILLINOIS

for

Evaluation Year 2000

(October 1, 1999 to September 30, 2000)

**Prepared by the Indianapolis Field Office
November 2000**

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I. Introduction

The Surface Mining Control and Reclamation Act of 1977 (SMCRA) created the Office of Surface Mining Reclamation and Enforcement (OSM) in the Department of the Interior. SMCRA provides authority for OSM to oversee the implementation of, and provide Federal funding for State regulatory and abandoned mine land programs approved by OSM as meeting the minimum standards specified by SMCRA. This report contains summary information regarding the Illinois Regulatory and Abandoned Mine Land (AML) Programs and the effectiveness of these programs in meeting the applicable purposes of SMCRA as specified in section 102. This report covers the period of October 1, 1999 to September 30, 2000.

The primary thrust of OSM's oversight policy is a strategy that evaluates the end result of State program implementation. Regulatory program oversight focuses on State success in ensuring that areas off the mine site are protected from impacts during mining, and that areas on the mine site are reclaimed contemporaneously and successfully after mining activities are completed. This policy emphasizes State-specific evaluation plans worked out by consensus between OSM and the State in an annual performance agreement. The policy also encourages public participation as part of the oversight strategy. Besides the primary focus on evaluating end results, oversight guidance makes clear OSM's responsibility to conduct inspections to monitor the State's effectiveness in ensuring compliance with SMCRA's environmental protection standards.

Oversight is an ongoing process. To further the purpose of continuous oversight, this report will present OSM and Illinois progress in conducting evaluations and completing oversight activities, as well as accomplishments during this evaluation period. Detailed background information and comprehensive reports for the program elements evaluated during the period are available for review and copying at the Indianapolis OSM Field Office, 575 North Pennsylvania Street, Indianapolis, Indiana 46204. The Field Office may also be reached at 317-226-6700, or via E-mail at ifomail@osmre.gov. The Indianapolis Field Office (IFO) will mail copies of specific reports, when requested.

The following list of acronyms are used in this report:

AML----- Abandoned Mine Land
AMLRD---- Illinois AML Reclamation Division
AVS----- Applicant/Violator System
EPR-----Enhancement and Performance Review
EY ----- Evaluation Year
IFO-----Indianapolis Field Office

LRD----- Land Reclamation Division
 NRCS----- Natural Resources Conservation Service
 OMM-----Illinois Department of Natural Resources, Office of Mines and
 Minerals
 OSM-----U. S. Department of the Interior, Office of Surface Mining
 Reclamation and Enforcement
 RC&D----- Resource Conservation and Development Area
 SMCRA-----Surface Mining Control and Reclamation Act of 1977
 TIPS----- Technical Information Processing System

II. Overview of the Illinois Coal Mining Industry

Illinois is one of the largest coal producing states in the nation. It has the largest known bituminous coal reserve of any state. About two-thirds of the State's area (36,806 out of 56,400 square miles) is underlain by coal bearing Pennsylvanian Era rock. Strata of the Pennsylvanian system underlie all or parts of 86 of the 102 counties of the State. An estimated 181 billion tons of coal resources are still in the ground. Using present mining methods, more than 30 billion tons are classified as recoverable. Recoverable coal reserves in Illinois account for nearly one-eighth of the total U.S. coal reserves, and one-quarter of the nation's bituminous coal reserves.



Typical Midwest Area Mine

Surface, underground and auger mining methods are used in Illinois to extract the mineral. All surface mines in the State are classified as area mines, while continuous and long-wall methods are employed in underground mines. A small amount of coal is also produced from carbon recovery operations. The amount of coal mined in Illinois during 1999 was 39.9 million tons. This represents a decrease of 0.6 million tons from 1998.

In 1999 (most recent data), coal mining in Illinois employed 3,675 citizens and generated an estimated 25,000 spin-off jobs. Coal mining accounts for as much as 12 percent of employment in some counties. Most of Illinois' coal is consumed by electric utilities. About two-thirds of Illinois coal is sold to out-of-state electric utilities. Most electric utilities, however, burn a combination of local and out-of-state coal since Illinois coal is relatively high in sulfur content which makes it difficult to meet national Clean Air Act standards. Coal from some western states is low in sulfur, and may be blended with high sulfur Illinois coal which

helps in meeting air pollution requirements, but hurts Illinois' coal economy. Phase II of the Clean Air Act amendments which went into effect January 1, 2000 may complicate the matter even further.

On the other hand, however, the Clean Air Act amendments may, in part, account for a more optimistic outlook which surfaced during 2000 for the Illinois coal industry. After years of slow decline in coal production, generally attributed to the 1990 Clean Air Act, such experts



Typical Truck-Shovel Operation

as the Illinois Department of Commerce and Community Affairs, and Southern Illinois University's Coal Research Center are predicting a turnaround. The State has issued permits for at least three new mines in the last year, and some mines are seeking to expand. The Illinois Coal Association believes that "Illinois coal is going to be back in the marketplace". More strict regulations could require anti-pollution devices to be used on essentially all coal, not just high-sulfur coal like what is produced in Illinois. It is considered likely that this would make Illinois coal more competitive.

Power companies can mix inexpensive Illinois coal with costlier, but cleaner Western coal and still meet pollution limits. Additionally, in May 2000, Illinois Governor Ryan announced the awarding of 26 grants totaling almost \$11.6 million to improve coal production and transportation systems in the State.

As of September 30, 2000 there were twenty-four (24) active coal mines in Illinois. Of these, 7 are surface mines, 15 are underground mines, and two are carbon recovery operations. While no active surface mining is currently occurring on Federal lands in Illinois, there is one active long-wall underground mine, a part of which has expanded onto Federal land.

III. Overview of the Public Participation Opportunities in the Oversight Process and the State Program

IFO Oversight Outreach and Public Participation Activities

During Evaluation Year (EY) 2000 the IFO continued the use of the OSM tracking system started last year, which helped facilitate the public participation process. This plan provided a systematic means of tracking all citizen interactions to ensure timely follow up, both with the citizen and within OSM itself

The IFO also continued to use the citizen guide on a 5 ½ by 8 ½ inch card outlining information about how to report current or past coal mining problems. The IFO was able to enhance interactions with citizens in Illinois providing this convenient guide on several occasions in EY 2000.

The outreach letters IFO mailed in 1998 to approximately 75 stakeholders in Illinois coal mining and reclamation still served public participation purposes in EY 2000. This mailing invited customers to be included on IFO's electronic mailing list for the timely dissemination of information about OSM actions or other pertinent information, and provided IFO's E-mail address for communication purposes as well. Likewise, the IFO internet website was available and active during EY 2000.

Illinois OMM Public Participation Activities

The Illinois Department of Natural Resources, Office of Mines and Minerals (OMM), Land Reclamation Division (LRD) continued public outreach at State and County Fairs during EY 2000 to make citizens aware of its processes, and citizens' rights regarding surface coal mining and reclamation activities. The general public has historically not had much factual information about modern mining and reclamation techniques, or about coal mined in Illinois and its uses. This affects public attitude towards mining and the role of regulatory agencies. The LRD participates in a variety of programs to provide factual information, besides State and local fairs.

Other activities which the OMM engaged in during this reporting period, include Earth Day programs, Conservation Fairs, Eco-Meets, Coal Awareness Day, teacher education workshops, and classroom presentations. OMM's education materials most favorably received were the "Mining, Minerals, and Reclamation Jeopardy" game and a Teacher Education packet. The packet provides a comprehensive list of audio visual and printed resources available for teachers. Most of OMM's education programs are oriented toward school age children, although several thousand people of all ages visit OMM's exhibits at the two annual State Fairs. In EY 2000 the OMM added a new electronic button display to its inventory of educational materials, which shows where mines are within the state by type of mineral. This year the OMM's educational program was increasingly active.

In addition, the Office of Mines and Minerals' Web site continues to receive hundreds (historically about 1000) of visits per month. Although the OMM is no longer monitoring web site visits, the web site continued to serve as a valuable means of public participation for the agency during this reporting period.

The OMM had occasion in EY 2000 to interact with citizens relative to a controversial issue concerning a coal company's plans to operate near a river and a nature preserve in Vermillion County that is home to four types of endangered species. The OMM went beyond public participation requirements by providing the public an opportunity to be heard early on by having a public meeting in Vermillion County.

IV. **Major Accomplishments/Issues/Innovations in the Illinois Program**

In EY 2000 Illinois continued to administer its program in a way that effectively protects citizens and the environment from adverse environmental impacts resulting from surface coal mining activities. The OMM maintained its Regulatory and Abandoned Mine Land Programs to assure that they meet minimum national standards and effectively provide protection from the adverse effects of surface coal mining operations.

Illinois submitted formal program amendment proposals to OSM toward the end of the 1999 Evaluation Year, which received final OSM approval in EY 2000. These amendments were later separated into three parts. Part I responded to OSM's May 20, 1996, Part 732 letter concerning underground coal mining subsidence repair or compensation, and water replacement provisions resulting from the National Energy Policy Act of 1992. Part II contained provisions for formal administrative review of bond adjustments. Illinois submitted Part III in EY 2000 which responded to OSM's June 17, 1997, and January 15, 1999, Part 732 letters, and relates to Natural Resources Conservation Service (NRCS) TR-60 requirements for impoundments. This last amendment was approved in April 2000.

During this evaluation year OSM's Applicant/Violator System (AVS) program personnel conducted a study and determined that there were some problems nationwide with timely AVS data entry on the part of states. Once those problems were brought to the states' attention they were quickly resolved. The results of that study, however, highlighted the need for additional data entry studies. This study focused on newly issued, renewed, or transferred permits, and bond forfeiture actions. Once again states were called upon for information to resolve the issue. In both instances the Illinois OMM responded promptly in helping resolve this matter. This cooperativeness is to the Illinois OMM's credit.

Of the 156,026 acres of surface mines permitted since 1983 under the permanent program, 42,334 acres had full bond release through FY 2000. This includes acreage which has been re-permitted or released as unaffected. During the 2000 evaluation year 5,098.27 acres achieved surface stability and were returned to their approximate pre-mining contour; surface stability was achieved and vegetation established on 4,058.34 acres; approved post mining

land use was achieved, appropriate successful vegetation established and productivity



Extraction of Coal



Achieving Approximate Original Contour After Extracting Coal

restored on 4,976.34 acres; and surface and groundwater quantity and quality restored to 4,976.34 acres. In addition, the State released final vegetation bond on 181.6 acres of interim program, or older, areas. Under 50 acres remain under bond for these pre-permanent program permits.

During this evaluation period bond releases in Illinois has greatly increased compared to past years.

The Illinois AML program maintained its usual responsiveness to public concerns. The AML staff routinely responds to numerous public inquires concerning AML problems, and continues a successful program of public education.

An overall assessment of the Illinois AML Program in EY 2000 indicates that the Abandoned Mine Land Reclamation Division (AMLRD) was effective in reclaiming mined areas left without adequate reclamation. Substantial progress was made toward the goal of mitigating the adverse effects of past coal mining posing public health and safety problems and lower priority environmental problems also.

The AML Emergency Program was effective in meeting public safety needs during EY 2000. Ten emergencies were declared. Seven of these were sudden occurrences of dangerous mine openings, such as vertical shafts and pit caused by underground mine subsidence. The State put out two coal refuse fires, and protected people from danger when a commercial structure was damaged by sag subsidence.

The Illinois AML Program continued to make progress during EY 2000 toward reaching Clean Streams Initiative goals.

V. **Success in Achieving the Purposes of SMCRA as measured by the Number of Observed Off-Site Impacts and the Number of Acres Meeting the Performance Standards at the Time of Bond Release**

To further the concept of reporting end results, findings from performance standard and public participation evaluations relating to the number and extent of observed off-site impacts, the number of acres mined and reclaimed which meet bond release requirements for the various phases of reclamation, and the effectiveness of the State's customer service are reported nationally by OSM. Specific information about these evaluations in Illinois is described below. Reports on each of these three oversight activities are available in the Indianapolis Office which provide additional details on how the following evaluations and measurements were conducted.

A. **Off-Site Impacts**

A main premise of SMCRA is the protection of the public, property, and the environment outside areas authorized for mining and reclamation activities. The goal, therefore, is that there be minimal or no impacts outside the permit area. To accomplish this goal, State programs are to direct efforts to continually decrease the occurrence of off-site impacts.

Thus, the IFO and LRD conducted a joint evaluation in EY 2000 to determine the effectiveness of the State program in protecting the public and the environment from off-site impacts caused by surface mining and reclamation operations. This evaluation was conducted and reported as prescribed in OSM Directive REG-8.

Evaluation conclusions were drawn from the following data obtained from on-site inspections: number of observations made, number of impacts found, the degree and type of impact, each resource affected, the number of mine sites or permits causing impacts, and the number of permits or mines evaluated. The IFO's evaluation method consists of obtaining numbers of off-site impacts reported by the State (see Appendix A, Table 4), and then using IFO collected off-site impact data to verify the State's reported numbers.

The six off-site impacts observed by the LRD during this evaluation year indicate a trend of decreasing occurrences. The LRD observed nine off-site impacts in EY 1999, and 14 in EY 1998. The six impacts were on five inspectable units (consisting of five permits) observed by the LRD in the course of inspecting 104 inspectable units in EY 2000. These off-site impacts were of a hydrologic and encroachment nature,

most of which affected land and water resources to a minor nature. In EY 2000, IFO staff IFO observed only one off-site impact on one mine site in the course of making partial inspections on 23 inspectable units, and complete inspections on 20 inspectable units. The one off-site impact the IFO observed, was one of the same impacts reported by the LRD. It was a hydrologic impact affecting the land resource to a minor degree. IFO data verified State reported information with a similar very high percent of impact-free inspectable units.



Typical Reclamation
Productivity Restored

The IFO issued one (1) Ten Day Notice in the first half of EY 2000 relating to off-site impacts. This action was for failure to adequately cover or treat acid- and toxic-forming materials to control impact on surface water and vegetation.

The IFO concludes from its evaluation that Illinois administered its program during EY 2000 in a way that is extremely effective in protecting the public and the environment from adverse off-site impacts caused by surface coal mining operations.

B. **Bond Release (Reclamation Success)**

Thousands of acres of land affected by surface coal mining operations were successfully reclaimed during this evaluation year as noted in Appendix A, Table 5. This data, summarizing the number of acres achieving successful reclamation through bond release during the evaluation year, provides a baseline for comparison with bonded acres existing at the beginning of the review period and the number of new acres bonded during the review period.

During this period, Illinois operators restored 5,098 acres of mined land to approximate original contour with soil replacement as indicated by Phase I bond releases; stabilized the surface and established vegetation on 4,058 acres as indicated by Phase II bond releases; and established the post mining land use with restoration of productivity and hydrologic balance on 4,976 acres as indicated by Phase III releases. This information may be taken as one indicator for evaluating the overall success in which reclamation is staying current with mining.

The IFO/ OMM EY 2000 Performance Agreement included a section on Land Restoration Performance Measurement. That section specified that the IFO would field review OMM bond releases to determine if acres of bond releases demonstrated acres of successful reclamation as hypothesized in OSM Directive REG-8.

Indianapolis Field Office reviews during EY 2000 verified that OMM bond releases are a valid measure of successful reclamation. The IFO conducted five bond release inspections during EY 2000 as a representative sample of all bond releases during that period. These five inspections were on five mines covered by eight permits. The IFO concurred with nearly all of OMM's final decisions on bond release. During inspections on two mines a problem on less than one acre of Phase III release was noted, but the operator corrected it before final release. The IFO found no surface water seeps, water discharge problems, nor any citizen complaints.

In EY 2000 the IFO conducted five bond release inspections on five mines covered by eight permits. As a result of these inspections the IFO issued one Ten Day Notice for a violation: failure to maintain a diversion ditch.

C. **Customer Service**

OSM's REG-8 requires an evaluation of the effectiveness of customer service provided by the State. The IFO chose to evaluate the State's actions in providing for public participation in the permit processing function. Specifically, this evaluation concerned whether permit applicants are submitting permit application modifications to the appropriate public office at the same time the change is submitted to the OMM, as required by Illinois regulations.

The IFO reviewed three Illinois permit processing actions during this evaluation period which required filing of application modifications in the appropriate public office for public review. As a result of this review the IFO found that the applicant's response to required permit modifications was filed in the County Clerk's office for public inspection and copying before the permit was issued, but not at the same time it was submitted to the OMM. Rather, OMM first received the applicant's modifications, then after the modification response was determined to be acceptable, they were filed in the County Clerk's office.

At that point in the process, Illinois regulations do not provide for public comment on the modifications whether the applicant sent them to the County Clerk at the same

time they were sent to OMM or whether OMM sent them. Either way, the next public participation opportunity is the same: the permit decision may be contested by an affected party. Therefore, IFO's conclusion was that the State was effectively providing customer service in the permit application process.

VI. **OSM Assistance**

The primary mode of OSM assistance to Illinois is through grant funding. The amount of grant funding awarded to Illinois for the operation of the regulatory program in EY 2000 was \$2.33 million (Appendix A, Table 9). OSM provided 47% of the total funding necessary for regulatory program operation. Additionally, OSM provides financial assistance to the Illinois AML Program. OSM provides 100% funding for the Abandoned Mine Land program in Illinois, which totaled \$10,031,430 in EY 2000.

Additionally, assistance was provided in several other ways which include:

- OSM technical training courses were offered throughout the year which address technical aspects of mining and reclamation. These courses were provided for state participants and OSM employees, as well as industry and others on a space available basis. During this oversight year, The Illinois OMM, LRD sent 18 participants to 13 different OSM training courses.
- OSM provided a Technical Information Processing System (TIPS) workstation and software for state use. OSM Mid-Continent Regional Coordinating Center staff performed necessary trouble shooting and software installation as part of the first phase of the TIPS UNIX to NT conversion. OSM also installed a new TIPS plotter in Illinois in EY 2000 to replace a faulty one. Illinois can use the system for a variety of tasks related to permit application processing and other technical or engineering evaluations.
- Informal discussions occurred between OSM and State management and staff that are the product of a good working relationship. Informal assistance is provided regarding field or program implementation issues on a continuous basis.

VII. **General Oversight Topic Reviews**

In addition to the off-site impact, reclamation success/bond release, and customer service reviews, IFO conducted oversight activities in the program areas listed below. Copies of

oversight documents relating to these topics may be obtained at the IFO office or by requesting specific reports by mail at the following address:

Office of Surface Mining Reclamation and Enforcement
Indianapolis Field Office
575 North Pennsylvania, Room 301
Indianapolis, Indiana 46204

The IFO can also be contacted by E-mail at IFOMAIL@indgw.osmre.gov.

- **Permit Application Review Findings**

This oversight element was included in the EY 2000 Illinois/OSM Performance Agreement because the Director of OSM established “permit findings” as a national review topic to be addressed in EY 2000 or 2001. This mandate came about because of a 1999 court decision (not involving Illinois) which raised concerns about the adequacy of regulatory authority permit review findings in all primacy states, and the documentation supporting those findings. Adequacy of permit findings had not been identified as a problem in Illinois. A State’s permit decision itself was not a subject of evaluation, just the adequacy of the findings upon which the decision was based.

The results of IFO’s oversight evaluation in EY 2000 was that the Illinois Regulatory Authority’s permit application review findings were in accord with the State’s approved program. Further, the documentation supporting those findings, was found to be adequate for sound permit application decision making.

- **Groundwater Monitoring Team**

During EY 2000, a joint LRD/IFO team conducted a review to determine if the procedure used by the LRD results in the timely collection, reporting, and review of ground water monitoring information necessary for informed decision making. This involved a review of State rules, regulations and guidance pertaining to ground water monitoring; a determination of the different ground water monitoring plans contained in the mine permits; and the current LRD procedures and staff responsibilities pertaining to the collection, reporting review and database entry of ground water monitoring information.

The typical geological setting in Illinois results in a lack of significant ground water resources at the majority of mines. Even so, the LRD maintains a database containing

ground water monitoring data and conducts reviews of that data at all mid-term permit reviews; at the time of phase III bond release requests; when reviewing special cases involving coal combustion waste disposal; when citizens complaints allege ground water problems; and other times as needed.

Currently, the LRD has a good system for the collection, reporting and review of ground water monitoring. In an effort to enhance the LRD's ability to ensure ground water monitoring and review of monitoring data are being conducted as necessary to protect ground water, the team made the following recommendations:

1. Develop a written procedure describing LRD staff responsibilities pertaining to the collection, reporting and review of ground water monitoring data;
2. Develop a standard form or database for use by inspectors to identify and track the ground water monitoring requirements at their assigned mines;
3. Increase the frequency at which ground water monitoring data is reviewed and interpreted by the LRD;
4. Develop and implement a plan to identify and obtain any ground water monitoring data not entered into the ground water database.

Even before the team's report was finalized, the LRD had begun development of a procedure for the electronic submission of ground water monitoring data and revision of the ground water database to identify abnormal ground water monitoring data. This should improve the LRD ability to increase the frequency of ground water monitoring data reviews. During EY 2001, the IFO will follow-up with a review to determine what other actions that LRD has taken to enhance their ground water monitoring program.

- **Complete Inspections**

During EY 2000 the IFO conducted mine site evaluations on a sample of 20 active mining operations to gain an overview of the on-the-ground impacts of these operations. In so far as possible, these inspections were conducted jointly with State inspectors.

During these complete inspections, IFO and LRD inspectors found only two violations that involved on-the-ground impacts. Neither of the impacted areas

resulted in off-site impacts, and in both cases the LRD took enforcement action which resulted in elimination of the impacts.

The IFO concluded that the small number of on-the-ground impacts identified during the evaluation year indicate that the LRD is successfully ensuring mining is being conducted in a manner that causes few adverse on-the-ground impacts. The lack of on-the-ground impacts also indicates a strong potential for reclamation success on these areas. This conclusion was reinforced by the fact that the two impacts observed in EY 2000 represent an improvement over the six violations identified during similar oversight conducted in EY 1999.

- **Abandoned Mine Land Reclamation**

In EY 2000 the IFO conducted an evaluation of the Illinois Department of Natural Resources, Abandoned Mine Land Reclamation Division's administration of its approved AML Program. Program functions to be evaluated were mutually agreed to in the EY 2000 Performance Agreement with the AMLRD. Enhancement and Performance Reviews (EPR) were conducted in accordance with OSM Directive AML-22 and the negotiated performance agreement. The purpose of this evaluation was to assure proper implementation of the approved AML program, and to determine if improvements or enhancements may be realized. Evaluation in EY 2000 was in the following general program areas:

- Maintenance of, and adherence to, the approved AML Plan via appropriate updating.
- Effectiveness of "on the ground" reclamation.

In addition to EPR activities, the AMLRD and IFO agreed to share data as needed, and that the AMLRD would provide the IFO with a detailed description of its AML database. The AMLRD did that early in EY 2000.

The results of IFO's EY 2000 AML oversight evaluations are summarized below.

Project Ranking and Selection Process

This review of AMLRD project ranking and selection process was to verify that it complies with the approved State Plan, or if in variance, that it can be reasonably justified. This program function relates to the second principle of excellence listed in OSM Directive AML-22, which supports the concept that Program States must have

approved plans meeting Federal requirements, and conduct reclamation in accordance with it.

The IFO's evaluation included a review of regular Federally funded projects completed under the State's FY 1996, 1997, 1998, and 1999 AML grants. Conclusions drawn from this evaluation were that the AMLRD's project ranking and selection process is being conducted according to its approved plan. However, the IFO found that the program's adherence to the plan was not well documented in the State's official project files. The IFO recommended that complete documentation be maintained by the AMLRD. This recommendation was accepted by the AMLRD, and actions to ensure thorough documentation have already begun.

Post-Reclamation Unplanned Maintenance Team

Unplanned maintenance, or remedial work on reclaimed AML sites pertains to the principle that on-the-ground reclamation is to be achieved in a timely, cost-effective manner. A joint AMLRD/IFO team was selected to evaluate this aspect of the State Program. In the course of its evaluation effort during this evaluation year the team determined a need for additional time to complete its task. AMLRD and IFO management granted the team an extension of time. The unplanned project maintenance evaluation will be completed in EY 2001.

Post-Construction Reclamation Effectiveness

The purpose of this IFO evaluation was to determine the prospect for long term success at sites where reclamation has been completed. This review relates to the third principle of excellence found in OSM Directive AML-22 concerning the timely, cost-effective achievement of enduring on-the-ground reclamation.

The findings of this evaluation were that Illinois AML reclamation: (1) was overall successfully accomplished, although a couple of projects in the review were in need of minor remedial work to prevent a bigger problem, (2) met program goals, (3) was cost-effective, and (4) resulted in a net benefit to society.

These findings led to the conclusion that the potential for long-term success of completed reclamation in Illinois is very good. The IFO did, however, recommend that the AMLRD consider revisiting and fine tuning its internal program for post-construction evaluation.

Illinois Clean Streams Initiative

The Clean Streams Initiative in the EY 2000 Performance Agreement was a continuation of the EY 1998 agreement for the AMLRD and IFO to partner in reaching the goal of restoring the water quality of the Saline River, South Fork Watershed. The Illinois Clean Streams Program continued to progress toward meeting its goal during EY 2000.

The Will Scarlet and Palzo Projects in the Saline River basin, managed by the AMLRD, have shown improvement in on-site water quality. Other Clean Streams Initiative and Watershed Agreement potential projects are being encouraged by the AMLRD. The Shawnee Resource Conservation and Development (RC&D) Area, has shown interest in becoming partners in the program, and held information meeting during EY 2000 in conjunction with the AMLRD and IFO. Representatives of the Shawnee RC&D also met with the South Fork Patoka River Watershed group in Indiana, to learn from this highly successful group. The progress made in EY 2000 is anticipated to result in more local, funded projects in Illinois.

APPENDIX A:

The tables in this appendix present data pertinent to mining operations and State and Federal regulatory activities within Illinois. They also summarize funding provided by OSM, and information about Illinois staffing. Unless otherwise specified, the reporting period for the data contained in all tables is October 1, 1999 to September 30, 2000. Additional data used by OSM in its evaluation of Illinois' performance is available for review in the evaluation files maintained by the Indianapolis Field Office.

TABLE 1

COAL PRODUCTION (Millions of short tons)			
Period	Surface mines	Underground mines	Total
Coal production ^A for entire State:			
Annual Period			
1997	7	35	41
1998	5	36	41
1999	4	36	40
	15	107	122

^A Coal production as reported in this table is the gross tonnage which includes coal that is sold, used or transferred as reported to OSM by each mining company on form OSM-1 line 8(a). Gross tonnage does not provide for a moisture reduction. OSM verifies tonnage reported through routine auditing of mining companies. This production may vary from that reported by States or other sources due to varying methods of determining and reporting coal production.

TABLE 2

INSPECTABLE UNITS As of September 30, 2000												
Coal mines and related facilities	Number and status of permits								Insp. Unit^D	Permitted acreage^A (hundreds of acres)		
	Active or temporarily inactive		Inactive Phase II bond release		Abandoned		Totals					
	IP	PP	IP	PP	IP	PP	IP	PP		IP	PP	Total
	STATE and PRIVATE LANDS REGULATORY AUTHORITY: STATE											
Surface mines	0	23	20	87	0	1	20	111	55	25	709	734
Underground mines	0	59	0	25	0	0	0	84	40		154	154
Other facilities	0	7	0	4	0	0	0	11	6		55	55
Subtotals	0	89	20	116	0	1	20	206	101	25	918	943
FEDERAL LANDS REGULATORY AUTHORITY: STATE												
Surface mines	0	0	0	0	0	0	0	0	0	0	0	0
Underground mines	0	1	0	2	0	0	0	3	3	0	.22	0
Other facilities	0	0	0	0	0	0	0	0	0	0	0	0
Subtotals	0	1	0	2	0	0	0	3	3	0	0	0
ALL LANDS^B												
Surface mines	0	23	20	87	0	1	20	111	55	25	709	734
Underground mines	0	60	0	27	0	0	0	87	43	0	154	154
Other facilities	0	7	0	4	0	0	0	11	6	0	55	55
Totals	0	90	20	118	0	1	20	209	104	25	918	943
Average number of permits per inspectable unit (excluding exploration sites) <u>2.4</u>												
Average number of acres per inspectable unit (excluding exploration sites) <u>907</u>												
Number of exploration permits on State and private lands: <u>0</u> On Federal lands: <u>0</u> ^C												
Number of exploration notices on State and private lands: <u>0</u> On Federal lands: <u>0</u> ^C												
<p>IP: Initial regulatory program sites. PP: Permanent regulatory program sites.</p> <p>^A When a unit is located on more than one type of land, includes only the acreage located on the indicated type of land. ^B Numbers of units may not equal the sum of the three preceding categories because a single inspectable unit may include lands in more than one of the preceding categories. ^C Includes only exploration activities regulated by the State pursuant to a cooperative agreement with OSM or by OSM pursuant to a Federal lands program. Excludes exploration regulated by the Bureau of Land Management. ^D Inspectable Units includes multiple permits that have been grouped together as one unit for inspection frequency purposes by some State programs.</p>												

TABLE 3

**STATE PERMITTING ACTIVITY
As of September 30, 2000**

Type of application	Surface mines			Underground mines			Other facilities			Totals		
	App. Rec.	Issued	Acres	App. Rec.	Issued	Acres ^A	App. Rec.	Issued	Acres	App. Rec.	Issued	Acres
New permits	4	5	5067	4	3	300	1	0	9	9	8	5,376
Renewals	3	10	4367	14	23	5106	2	2	0	19	35	9,473
Transfers, sales and assignments of permit rights	13	13		5	8		0	0		18	21	
Small operator assistance	0	0		0	0		0	0		0	0	
Exploration permits	0	0		0	0		0	0		0	0	
Exploration notices ^B		0			0			0			0	
Revisions (exclusive of incidental boundary revisions)		8			6						14	
Incidental boundary revisions		6	86		3	42		2	25		11	153
Totals	20	42	9,520	23	43	5,448	3	4	34	46	89	15,002

OPTIONAL - Number of midterm permit reviews completed that are not reported as revisions _____

^A Includes only the number of acres of proposed surface disturbance.

^B State approval not required. Involves removal of less than 250 tons of coal and does not affect lands designated unsuitable for mining.

TABLE 4

OFF-SITE IMPACTS														
DEGREE OF IMPACT		RESOURCES AFFECTED												Total
		People			Land			Water			Structures			
		minor	moderate	major	minor	moderate	major	minor	moderate	major	minor	moderate	major	
TYPE OF IMPACT	Blasting													
	Land Stability													
	Hydrology				1	1		4						5
	Encroachment				1									1
	Other													
	Total	0	0	0	2	1	0	4	0	0	0	0	0	0
Total number of inspectable units: 102 Inspectable units free of off-site impacts: 97														
OFF-SITE IMPACTS ON BOND FORFEITURE SITES														
DEGREE OF IMPACT		RESOURCES AFFECTED												Total
		People			Land			Water			Structures			
		minor	moderate	major	minor	moderate	major	minor	moderate	major	minor	moderate	major	
TYPE OF IMPACT	Blasting													
	Land Stability													
	Hydrology													
	Encroachment													
	Other													
	Total	0	0	0	0	0	0	0	0	0	0	0	0	0
Total number of inspectable units: 2 Inspectable units free of off-site impacts: 2														

Refer to the report narrative for complete explanation and evaluation of the information provided by this table.

TABLE 5

ANNUAL STATE MINING AND RECLAMATION RESULTS		
Bond release phase	Applicable performance standard	Acreage released during this evaluation period
Phase I	! Approximate original contour restored ! Topsoil or approved alternative replaced	5098.27
Phase II	! Surface stability ! Establishment of vegetation	4058.34
Phase III	! Post-mining land use/productivity restored ! Successful permanent vegetation ! Groundwater recharge, quality and quantity restored ! Surface water quality and quantity restored	4976.34
	Bonded Acreage Status^A	Acres
	Total number of bonded acres at end of last review period (September 30, 1999) ^B	96757.34
	Total number of bonded acres during this evaluation year	3189.82
	Number of acres bonded during this evaluation year that are considered re-mining, if available	0
	Number of acres where bond was forfeited during this evaluation year (also report this acreage on Table 7)	0
^A Bonded acreage is considered to approximate and represent the number of acres disturbed by surface coal mining and reclamation operations. ^B Bonded acres in this category are those that have not received a Phase III or other final bond release (State maintains jurisdiction).		

OPTIONAL TABLES 6

(See Instructions)

TABLE 7

STATE BOND FORFEITURE ACTIVITY			
(Permanent Program Permits)			
	Number of Sites	Dollars	Disturbed Acres
Bonds forfeited as of September 30, 1999 ^A			
Bonds forfeited during EY 2000			
Forfeited bonds collected as September 30, 1999 ^A			
Forfeited bonds collected during EY 2000			
Forfeiture sites reclaimed during EY 2000		B	
Forfeiture sites repermited during EY 2000			
Forfeiture sites unreclaimed as of September 30, 2000			
Excess reclamation costs recovered from permittee			
Excess forfeiture proceeds returned to permittee			
^A Includes data only for those forfeiture sites not fully reclaimed as of this date. ^B Cost of reclamation, excluding general administrative expenses.			

TABLE 8

STATE STAFFING (Full-time equivalents at end of evaluation year)	
Function	EY 2000
Regulatory Program	
Permit review	21.00
Inspection	19.00
Other (administrative, fiscal, personnel, etc.)	12.00
SUB-TOTAL	52.00
AML Program	36.00
TOTAL	88.00

TABLE 9

FUNDS GRANTED TO [STATE] BY OSM (Millions of dollars) EY 2000		
Type of Grant	Federal Funds Awarded	Federal Funding as a Percentage of Total Program Costs
Administration and enforcement	2.33	47%
Small operator assistance	N/A	N/A
Totals	2.33	

APPENDIX B:

This Appendix contains Illinois Office of Mines and Minerals' comments on the draft annual evaluation report received by the IFO on December 12, 2000. A photocopy of the State's comment letter follows this page.

Presented below is the Field Office Director's disposition of the State's comments.

Disposition of Comments:

The State of Illinois had no comments on the Indianapolis Field Office's draft EY 2000 Annual Evaluation Report. No changes to the draft report were necessary.