

Inspection Summary Sheet – Recommended Topics to Consider

Note: This is not exhaustive list and is the minimum criteria to consider during the site inspection. Each mine site and situation will dictate what issues/criteria are most appropriate.

1. Plan, Notice, or Bond Status/Changes/Modifications –

- Note bond type** – APMA annual bond pool, individual financial guarantee (IFG).
- Note any bond, plan, notice, or other changes that need to be made or are requested by operator.**
 - Does new disturbed acreage measurements indicated that an increase in bonded acreage is required (if under the bond pool)?
 - Ensure maximum authorized disturbance is not exceeded (modification may be required if new acreage authorization is required).
 - Is there a modification needed/requested to prevent UUD or to make operations more complaint.
- Discuss with operator if RCE needs to be updated** (if applicable)?
- Note if operator is requesting partial or final bond release** (annotate acres requested).
 - Brief operator on process for final bond release per 3809.590(c) (bond pool or IFG).
 - If partial release on IFG, brief the operator on process per 3809.591(b).
- Preliminary Approval** –
 - If appropriate to operation and as directed by A.O., discuss use of **Preliminary Approval** for acreage that is pending final approval.

2. Access – (refer to H-3809-1 section 5.3.1- Access Routes)

- How was the site accessed** (air, boat, ATV/UTV) **by BLM and by operator?**
- Describe site access** –
 - Is access as described in the plan/notice – is access reasonably incident?
 - road/trail condition – does access maintenance need to happen to prevent UUD?
 - Examine road surface type, drainage conditions -- are there ditches alongside to allow water to flow away from road/trail, is there ponding, trail braiding, deep ruts, are there road cuts there are steeper than 3:1?
 - Discuss the use of appropriate BMPs that could help prevent UUD.
 - Are there new trails/roads or modifications that need to be discussed (do changes required a plan modification).
- Note if any gates are along access**– are they approved as part of the Use and Occupancy?
 - Note if key or combo is required.
 - Is a gate recommended/required for safety to protect public or sensitive resources.
- Are signs present along access** – are they approved as part of the Use and Occupancy?
 - Is a sign(s) recommended/required for safety to protect public or sensitive resources?

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3. Use and Occupancy and Safety –

- Are safety measures in place to protect operators and member of the public?**
 - safety signs for public, MSHA awareness.
- Is there concurrence for the occupancy?**
- Note structure condition and location,**
 - Note building purpose – i.e. residence, shop, cookhouse, etc.
- Note quantity and condition of equipment.**
 - Photograph VINs and license plates if applicable.
- Does the use and occupancy meet the “incident to mining” criteria?**
- Annotate any discussions with operator – is a modification needed?**

4. Fuels, HAZMAT storage, explosives –

- Is fuel/HAZMAT storage as described in plan/notice?**
 - Note if a modification is required to prevent UUD.
- Is secondary containment used and is it appropriate?**
 - If secondary containment is open to the elements – could a lean-to or other roof structure be constructed over the area?
 - How is contact water removed from containment area – what treatment method is used?
 - Does volume of secondary storage equal 110% of the largest capacity container?
- Review the spill contingency plan.**
 - Required per 3809.401(b)(2)(vi)
- Are there resources near fueling areas to cleanup spills?**
- Could fuel storage be safer?**
 - Example- Moved further away from water resources, located closer to mine area to reduce travel, how is the fuel transport truck stored when it is full of fuel but not being used, etc.
- Are there fuel/oil spills and/or stained soil indicating spilled liquid?**
 - Remind operator of requirement to cleanup and log all spills per DEC requirements.
 - Provide a copy of DEC spill reporting sheet if necessary.
 - Consider working with operator to identify area within currently disturbed footprint to establish a land spread to place contaminated material once it is excavated.

5. Mine Area, Washplant, Settling Ponds, etc. –

- Are the settling ponds as described in plan?**
 - Annotate differences in final “on-the-ground” pond design.
 - Are additional ponds needed for clarifying?
 - Identify measures necessary to modify ponds and/or add ponds to prevent UUD?

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- Is pond leaking?**
 - Is the leaking pond causing UUD (impacting surface waters, other sensitive resources) or is it controlled sufficiently with design features to prevent UUD?
 - Where does leaked pond water drain to (is it pumped back into pond or other settling areas)?
 - Are there catchment controls (ditches, berms, sumps) around pond to control pond leakage discharge?
- Is a spillway installed?**
 - Discuss storm event monitoring and controlled pond discharge as described in the APDES general permit.
 - Is spillway lined with large rocks or other control media to prevent berm failure/washout?
- Is a modification required to prevent UUD or to meet water management needs of operation – can modification be applied within currently authorized disturbance footprint?**
- Is the washplant area organized and setup to direct excess water to ponds?**
- Learn/Ask how washplant segregates material size-** how is this material mixed to facilitate reclamation? Are different size fractions left in separate “layers” during reclamation, if so why and are there benefits to that method or should other methods be discussed? When and how are pond fines removed from the settling ponds – how are they used once removed?
- Is the mine area within the footprint of the authorized area?**

6. Site Water Management –

- Identify if the operator has an General APDES or Mixing Zone permit.**
- Are there diversions and bypasses to move non-mining water around mine cuts (storm water or ground water redirect)?**
 - Are they stable?
 - Where does the water report to?
- How is storm water controlled off roads, pads, etc.?**
 - Consider recommending BMPs specified in the Alaska Storm Water Guide (SWPPP).
- If not 100% mine water recycle, where is discharge point and what is water quality and volume at discharge?** Coordinates and photos of discharge?
- Review monitoring records as required by APDES-**
 - For Individual permits with mixing zones – review monitoring records as required by ADEC permit.
 - All mines that are discharging that do not use an individual mixing zone permit should follow the general permit monitoring requirements as outlined on Page 6 of the APDES General Permit (GP) # AKG370000.
- Are disturbed upland areas stable and are there erosion controls?**
 - Where does water from uplands report to?

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- Consider recommending BMPs specified in the Alaska Storm Water Guide (SWPPP).
- Where is makeup water taken from and what is the volume?**
- Does the water management match the Plan or Notice?**
- Is a modification needed or are there recommendations that could be suggested on site to make water management more successful?**

7. Reclamation – (Note 3809.420 requires operations to take measures to *control* erosion, not necessarily prevent erosion)

- Is the operator aware of the reclamation requirements for streams and uplands per their reclamation plan?**
- Is the type and location of reclamation as described in the Plan or Notice?**
 - Are stockpiles used for reclamation stable? (topsoil, overburden, vegetation, etc.)
 - Can BMP suggestions be made to improve reclamation – use of veg plugs and other *alternative wildlife features*.
- For any new reclamation on site (current season) – is earthwork complete and topsoil and old vegetation used throughout?**
 - For areas with steeper slopes (~3:1), are reclamation features installed to control erosion? (seeding, transplants, weed-free mulch, straw, or erosion matting, etc.)
 - Annotate type and location of concurrent reclamation, if appropriate.
 - Are soil and vegetation resources being reused to help reclaim areas?
 - Is there sufficient soil placed over new reclamation areas (where appropriate)?
- For areas that have had earthwork completed but are awaiting revegetation (previous years reclamation) – is the area stable with minimal/no erosion?**
 - Is vegetation starting to reestablish? Can you establish an upward trend in positive revegetation? – Is there sufficient evidence to support approving reclamation?
 - Are there areas that seem to be stabilizing slower than other reclaimed areas? – are there measures that can be suggested to encourage revegetation/stabilization?
 - Is erosion causing UUD? Is operation following mine plan section that discusses measures to control erosion?
 - Consider recommending BMPs specified in the Alaska Storm Water Guide (SWPPP).
- Is there stream reclamation taking place (current season)?**
 - Is the stream reclamation work consistent with the approved reclamation plan?
 - Are vegetation-mat transplants being installed along the banks (if appropriate)?
 - Annotate if a stream reclamation specialist needs to visit the site for a more comprehensive assessment of the reclamation work.
- For existing sections of reclaimed stream channel – is the operator monitoring the reclaimed channel per their monitoring/reclamation plan?**

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- Annotate if a stream reclamation specialist needs to visit the site for a more comprehensive assessment.
- Is final reclamation sign-off being requested? Does the reclaimed area meet the requirements for final reclamation as described in the Reclamation Plan?**
 - Are there structures, equipment, or other “non-earthwork” related reclamation requirements?

8. Environmental concerns noted during the inspection –

- Is there potential for UUD? Can that be addressed on site to prevent UUD?**
- Consider if cultural, paleontological, wildlife (to include T&E species), fisheries, soil, air, water, vegetation are being impacted.**
- Annotate discussion of issues identified and attempt to resolve issues while on site (record corrections made while on site).**
- Are modifications to plan required to protect resources?**
- Is a site visit by the appropriate resources specialist or permitting agency recommended/required?**