

Wyoming Department of Environmental Quality  
WYPDES Coal Bed Methane (CBM) Inspection  
“What to Expect When You’re Inspected”



***Coal Bed Methane Inspections***

There are 286 permitted Coal Bed Methane (CBM) facilities in the state of Wyoming. CBM inspections are scheduled with as little pre-warning as possible to preserve the integrity of the inspection. However, WYPDES Inspectors will initiate contact with the permit holder to schedule a compliance inspection because CBM facilities and outfalls are spread out over large tracts of land and assistance is required to locate compliance points. CBM facilities are inspected at least once every five years to determine compliance with permit conditions. The inspection is two phased: record’s review and field inspection. Below is a summary of what occurs during both.

***Records Inspection:***

A record’s inspection is a quality assurance/quality control (QA/QC) audit conducted to determine if the information being reported to the regulatory agent is correct. The discharge monitoring reports (DMRs) submitted by the permittee must accurately reflect the analytical results reported by the lab on the associated laboratory reports and/or bench sheets. The audit also ensures that samples were collected and analyzed utilizing standard methods to produce reliable results.

The inspector will request an audit for approximately the last 18 months of documentation. Documentation necessary to maintaining compliance with the WYPDES permit must be maintained onsite or at the nearest local field office for a minimum of three years from creation. All records must be made available to DEQ staff upon request:

1. A copy of the current WYPDES discharge permit will be requested to confirm compliance.
2. Discharge records – flow information describing the dates, duration and volume (flow rate) discharged.
3. Discharge Monitoring Reports (DMRs) will be compared to their corresponding laboratory report forms to confirm reported results.
4. Laboratory analytical summary reports
5. Chain of custody (COC) forms will be reviewed to confirm sample dates and times, analysis requested, preservatives used, and temperature of samples upon receipt at the contract lab. The date and time of receipt of samples at the contract lab will also be reviewed to confirm parameter holding times.
6. Equipment (pH and EC meters) calibration logs will be observed to ensure that the meters are being appropriately calibrated and maintained.
7. Field documentation (Photos of discharge status, etc...)
8. Regulatory correspondence including exceedance notifications, letters of violation and/or notices of violation and past inspection reports.

9. A copy of the WYPDES permit should be on hand.

The audit can be conducted at the permittee's business or through the electronic Discharge Monitoring Report (eDMR) system from the inspector's office. Permittees can provide the required information to the inspector on a disc, flash drive, e-mail or mail hard copies of the documents to the inspector's office. An inspection report is generated noting compliance status. Letters of violation may be generated as a result of the inspection.

The following is a list of common non-compliance issues encountered during a record inspection:

1. Deficient header information on laboratory analytical report: client, project, sample ID, location, report date, collection date, date received, matrix, sampled by, etc.
2. Maximum holding time before analysis: 40 CFR, Part 136.3, Table II: Required Containers, Preservation Techniques and Holding Times.
3. Parameter exceedance of permitted limitations: Part 1.A.1, Effluent Limits, of issued permit.
4. Required information on analytical report: analyses, field data, result, unit of measure, reporting limit, analytical method and analysis date/by.
5. False reporting or transcribing of analytical results from the laboratory report form to DMR. This sometimes involves not reporting the maximum value on the DMR. The maximum value must always be reported.

### ***Field Inspection:***

Field inspections are conducted to determine compliance with permit conditions. Landowner permission is sought and granted prior to conducting the field inspection. The following list describes the steps taken to set up the field inspection and the type of information the inspector collects when conducting the field inspection:

1. Complete a site visit to document current physical status through narrative and/or photographs.
2. Ensure that each outfall and relevant monitoring point has the appropriate facility identification information (sign) posted at or near the point of discharge.
3. Collect flow data and water quality samples (if discharging).
4. Collect GPS coordinates at all permitted monitoring points.
5. Monitor containment unit to determine capacity, discharge status, presence of seeps, and embankment integrity.
6. Observe condition of outfall and receiving drainage.
7. Visit additional monitoring locations if applicable.

An inspection report is generated noting compliance status. Letter(s) of violation may be generated as a result of the inspection.

The following is a list of common non-compliance issues encountered during field inspections at Coal Bed Methane Facilities:

1. Inspection samples exceed permit limits.
2. Site identification sign missing or lacking one or more of the following: permittee, WYPDES number, contact information, name of the facility, outfall number, and reservoir outlet identification.
3. Improper outfall configuration: single flow path and adequate free-fall to collect representative water quality samples and flow measurement.
4. Unpermitted discharge: all discharge points must be permitted.
5. Erosion: riling and sediment transport.
6. Containment Unit markers: staff gages or elevational markers.
7. Seeps developing from below containment reservoir(s) and unauthorized discharges from containment reservoirs.