

Wyoming Department of Environmental Quality

WYPDES Coal Mine Inspection

“What to Expect When You’re Inspected”



Coal Mine Inspection Expectations

There are 23 permitted coal mines in the State of Wyoming. Coal mine inspections are scheduled with as little pre-warning as possible to preserve the integrity of the inspection. However, WDEQ does not make entry without the approval of the facility contact. A coal mine inspection occurs annually for individual discharge permitted facilities and consists of two parts: a record’s review and site inspection. Below is a summary of what occurs during both.

Records Review:

A records 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 year of documentation. Documents 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. Determine if discharge has occurred since the previous inspection.
2. If discharge has occurred, the facility’s DMRs are reviewed for accuracy. The DMRs are compared to the laboratory analytical reports (for dry weather discharge) and the field sheets containing information such as pH, dates of discharge, duration of discharge, flow rates and total settleable solids (for wet weather discharge).
3. Precipitation records will also be reviewed so an accurate determination can be made as to whether a discharge occurred during dry or wet weather.
4. If discharge has not occurred, the DMRs will be checked to ensure they were still submitted to WDEQ but with ‘No Discharge’ indicated.
5. WDEQ will confirm that the coal mine has a current copy of their permit on hand. Also, pH meter calibration sheets will be reviewed to confirm that these meters are being calibrated prior to the collection of pH data. The pH calibration buffer solutions will also be reviewed to ensure they have not expired.
6. Chain of custody (COC) forms will be reviewed to confirm sample dates and times, analysis requested, preservatives used, and the temperature of samples upon receipt at the contract or in house lab. The date and time of receipt of samples at the contract lab will also be reviewed to confirm parameter holding times.

7. Any other concerns or issues that may have been encountered since the previous inspection will be reviewed at this time.

Common Compliance Issues Encountered During Record's Reviews

1. Inability to provide pH meter calibration data.
2. Not collecting field pH within the 15 minute required holding time.
3. Field sheets not being consistently filled out.
4. When applicable, not completing unit conversions correctly.

Field Inspection:

Field inspections are conducted to determine compliance with permit conditions. 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. Site inspections at coal mines most often consist of WDEQ being escorted around the mine by the facility contact. The individual outfalls and their associated reservoirs (if applicable) will be visually inspected.
2. If an outfall is discharging, a sample will be collected. Depending on whether this is a dry weather or wet weather discharge, the varying analyte(s) of concern will be sampled for.
3. If no discharge is occurring, the outfall will be visually inspected for structural integrity, photographs will be taken and a Global Positioning System (GPS) coordinate will be collected.
4. If an outfall has an associated reservoir, it will also be inspected for structural integrity. WDEQ will confirm that it is not leaking and that there are no erosion cuts that could jeopardize the integrity of the reservoir. Photographs and GPS coordinates will be collected as well.

Common Compliance Issues Encountered During Site Inspections

1. No freefall for adequate sample collection.
2. Downstream erosion.
3. Discharging from an unpermitted outfall.
4. Analytical exceedances above the acceptable range.

