

INDIANA COMPLETE INSPECTIONS WORK PLAN - 2001

Note: The biggest changes in this work plan from all other preceding work plans is as follows:

- o the IFO will conduct complete inspections (no partials) on 50 inspectable units
- o off-site impact data will be collected during the complete inspections

OBJECTIVE: To further the concept of reporting off-site impacts and on-the-ground success, the Office of Surface Mining (OSM), Indianapolis Field Office (IFO) will in evaluation year (EY) 2001 evaluate and report on the effectiveness of the Indiana Division of Reclamation (IDOR) in protecting the environment and the public from off-site impacts and incidences of on-the-ground problems (field performance) resulting from surface coal mining and reclamation operations. OSM Directive REG-8, July 28, 1999, gives direction for this evaluation and states that this measurement is intended to: identify and report all off-site impacts that were identified and the degree of off-site impacts; determine causes of the impacts; and identify where improvements may be made to lessen the number and degree of impacts. Therefore, the goal of this measurement is that the IDOR and IFO direct efforts to decrease the occurrence of off-site impacts and on-the-ground problems.

Definition of Off-Site Impact - For purposes of this evaluation REG-8 defines an off-site impact as *anything resulting from a surface coal mining and reclamation activity or operation that causes a negative effect on resources (people, land, water, structures). The applicable State program must regulate or control the mining or reclamation activity or result of the activity causing an off-site impact. In addition, the impact on the resource must be substantiated as being related to a mining and reclamation activity and must be outside the area authorized by the permit for conducting mining and reclamation activities.* For example, a blasting operation that exceeds the State program's limits for vibration or air blast at a structure outside the permit area would be reported as an off-site impact where impacts to a resource (people, land, water, structure) are substantiated. Refer to REG-8 for additional examples.

Off-Site Impacts Not Regulated by the State Program - There are off-site impacts from mining and reclamation that are not regulated or controlled by SMCRA or State Programs. Refer to REG-8 for examples of off-site impacts not regulated by the State Program. REG-8 encourages the collection of information to be used to identify areas in State and/or Federal standards where improvements may be made that would further minimize off-site impacts. Information on off-site impacts not regulated by the State Program will be collected and reported on the attached **Off-Site Impact Reporting Form**. Space provided on the form should be used to describe why the impact is not regulated by the State program. This type of off-site impacts will be described separately in the work plan report and annual report, and will not be included in Table 4 of the annual report.

Complete Inspections by the IFO - The purpose of the inspections will be to obtain an overview of “on-the-ground impacts on these sites. Data collected by the state will not be reported to the IFO whether collected during state partial or complete inspections.

Type and Degree of Impacts and Resources Affected - The off-site impact information to be collected, evaluated, and reported are the number of off-site impacts; the degree of impacts; the types of impacts and resources affected. Each impact may affect more than one resource. This information should be reported on the attached **Off-Site Impact Reporting Form**.

Classify the degree of impact as minor, moderate or major. General guidelines for assessing the degree of impact are:

Minor

- C Small amount of disturbance outside of permit or authorized area
- C Small amount of sediment, flyrock, erosion outside permit or authorized area
- C Low volume or short duration water discharge that marginally exceeds effluent limits and has marginally negative impact on receiving stream water quality
- C Impact does not interfere with land use
- C Impact does not jeopardize public safety
- C Impact does not cause damage to uncontrolled structures or restricted areas

Moderate

- C Anything not fitting guidelines for minor or major impact

Major

- C Large amount of disturbance outside of permit or authorized area
- C Large amount of sediment, flyrock, or erosion outside permit or authorized area
- C High volume or long duration water discharge or poor quality enters a high quality stream
- C Impact interferes with land use
- C Impact jeopardizes public safety or causes personal injury
- C Impact causes damage to uncontrolled structures or restricted areas
- C Mining without a permit

Sources of Information for Off-Site Impacts

Off-site impact data will be collected from all IDOR partial and complete inspections and applicable IFO complete inspections of interim and permanent program inspectable units. These should include

citizen complaint inspections where off-site impacts have been substantiated and inspections of permanent program (not interim) bond forfeiture inspectable units. Only off-site impact information provided by the IDOR will be reported on Table 4 of the annual report. Off-site impact information collected by the IFO will be used for the purpose of verification and comparison to the information collected by the IDOR.

Reporting - Off-site impacts substantiated should be reported once, however, off-site impacts identified prior to this evaluation year that continue to exist (impact is active; e.g., additional sediment from a breached pond embankment not repaired), should be reported and footnoted in annual report Table 4 so that new impacts can be distinguished from those previously identified.

An off-site impact work plan report will be prepared and will be used as supporting documentation for the annual report. It will include detailed information on IDOR and IFO data collection, verification, and analysis: discuss any conclusion on the effectiveness of the State program in preventing off-site impacts; and discuss measures taken to address any identified program or implementation deficiencies. It will identify and report on the number and degree of off-site impacts; provide a general evaluation of causes of repetitive impacts where possible; and identify where improvements may be made to lessen the number and degree of impacts.

The data collected by the IDOR will be reported in Table 4 of the annual report, along with a narrative summary of the findings from the overall evaluation with proper reference to the data provided in Table 4.

IDOR TASKS:

- C From the IDOR **sources of information for off-site impacts** described above, provide the IFO with the numbers of off-site impacts that have been substantiated with specific information on the **type and degree of impacts and resources affected**.
- C For each off-site impact, including impacts not regulated by the State program, complete an **Off-Site Impact Reporting Form**. Provide the IFO with completed forms attached to related inspection reports within thirty (30) days following the end of each of the first three quarters of the EY. The quarters end on November 30, 2000, February 28, May 31, and August 31, 2001. For the last quarter of the EY, provide the completed forms by September 15, 2001.
- C Within thirty (30) days following the end of the first three quarters of the EY and by September 15, 2001 for the last quarter of the EY, provide the IFO with the total number of inspections (by inspection type) conducted and used as **sources of information for off-site impacts**.
- C If applicable, by September 15, 2001, provide the IFO with recommendations where improvements may be made to lessen the number and degree of off-site impacts. However,

recommendations can be submitted throughout the EY.

- C Participate in meetings that may be held on an as needed basis, to discuss off-site impact and on-the-ground problem findings.

IFO TASKS:

- C From the IFO **sources of information for off-site impacts** described above, collect information on numbers of off-site impacts that have been substantiated with specific information on the **type and degree of impacts and resources affected**. The IFO will collect off-site impact information and on-the-ground problems during complete inspections of 50 inspectable units which is a decrease from the total number of inspections conducted in the preceding evaluation years. The IDOR inspectors will be offered an opportunity to accompany IFO inspectors during inspections.
- C For each off-site impact, including impacts not regulated by the State program, complete an **Off-Site Impact Reporting Form**. The IDOR will be provided with completed forms attached to Mine Site Evaluation Inspection Reports by regular mailing. A copy of this documentation will also be provided to the appropriate IFO staff to which this work plan coordination has been assigned.
- C Participate in meetings that may be held on an as needed basis, to discuss off-site impact and on-the-ground problem findings.
- C Prepare a report on off-site impacts containing the information and making the findings and recommendations described above at **Reporting**. Report the off-site impact data collected by the IDOR in Table 4 in the annual report, along with a narrative summary of the findings from the evaluation. Provide the IDOR with a copy of the work plan report by October 1, 2001.

OUTPUT MEASURES:

With the information collected during this evaluation, the IDOR and IFO will be able to determine the effectiveness of the State program in protecting the environment and public from off-site impacts, and collecting data on on-the-ground problems resulting from coal mining and reclamation operations.

IFO PERSONNEL: Inspectors

DATE: October 2000