OHIO DEPARTMENT OF NATURAL RESOURCES
DIVISION OF RECLAMATION

POLICY/PROCEDURE DIRECTIVE
INSPECTION & ENFORCEMENT 93-6

SUBJECT: Inspection Reports

EFFECTIVE: June 28, 1993

PURPOSE: To provide guidance regarding the completion of inspection reports and the level of detail required on the reports.

Rule 1501:13-14-01 (F)(4) requires the prompt filing of inspection reports or other documents adequate to enforce the requirements of and to carry out the terms and purposes of Chapter 1513. of the Revised Code and rules adopted thereunder. An inspection report is to be filled out for every inspection and administrative review conducted.

Attached is the inspection report form currently being used by the Division. The report form items are numbered with corresponding explanations provided below:

[1] Self-explanatory.

[2] Self-explanatory.

[3] Provide the original permit issuance date (not adjacent area or renewal issuance date).

[4] Circle the type of inspection being conducted.

[5] Provide the permit number using the appropriate prefix letter(s) (B, C, D, E, F, P, T, IM).

[6] Provide the date of the last partial or complete on-site inspection. This is not to reflect an administrative review.

[7] Indicate the time the inspector arrives and departs the site.

[8] Circle the applicable type. ACF - should be circled if it is a tipple, prep plant, haul road or support facility permit.

[9] Circle the appropriate status. If the site is TINA, indicate the date TINA ends.

[10] Provide accurate acreage figures; Affected acreage is only needed for complete inspections.

[11] Describe the existing on-site ground conditions and the weather for the day.

[12] Performance Standards

1 = In compliance. Enter 1 next to the applicable performance standard to indicate that this area has been reviewed and that all conditions are in compliance with the law and regulations. The inspector should **specifically** comment (using corresponding performance standard area numbers) when progress is being documented or a condition is developing which could result in a violation.

2 = Non-compliance. This number is to be used if a violation has occurred. If a violation is issued (as reflected by the use of "2") a supporting narrative in section [13], "Comments" is required. A specific description of the violation and supporting documentation should be provided. In addition, the violation is to be tracked through subsequent inspection reports up to and including narratives providing progress of the abatement of the violation, extension, termination or other disposition of the violation. All administrative and on-site actions concerning issued violations are required to be documented on the inspection report.

3 = Not applicable. Self explanatory.

Performance standard items number 1 through 31 are to be numbered with a 1, 2 or 3 for any complete inspection. Items #24, 32, 33, and 34 are open for performance standards not covered or a special permit condition.

[13] This section should be utilized to describe all findings from an inspection. The narrative should be a specific description of the condition and progress of the mining operation. Any enforcement actions taken are to be documented as described above under [12],2 and the status of prior unabated enforcement actions are also to be described. The narrative under this section should be specific and descriptive enough to provide a third party reader (i.e. supervisor, operator

or another inspector) with a means to track permit mining and reclamation progress as well as special conditions, protected areas, etc. for ease of understanding each narrative should be preceded by the performance standard number.

[14] Provide signature.

[15] Indicate whether given directly to the operator or mailed.

[16] Self-explanatory.

[17] This form is to be used when additional pages are needed for the narrative on partial and complete inspections or when an administrative review is done.

Rule 1501:13-14-01 (C) specifies that the Chief shall conduct on average of at least one partial inspection per month of each active coal mining and reclamation operation. A "partial inspection" is an on-site or aerial review of a person's compliance with some of the permit conditions and requirements imposed under Chapter 1513. of the Revised Code and the rules.

Rule 1501:13-14-01 (D) specifies the Chief shall conduct an average of at least one complete inspection per calendar quarter of each active and inactive coal mining and reclamation operation under his jurisdiction. A "complete" inspection is an on-site review of a person's compliance with **all** permit conditions and requirements imposed under Chapter 1513. of the Revised Code and the rules.

The inspection report is the Division's primary record of a given mining operation. The level of detail should reflect the importance of the inspection report.

If there are any questions, please contact Gordon Hufford.

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Inspection & Enforcement

GLH/sz/ds