

Managing the Non-Compliant Site (Nonmetallic Mine Reclamation) 04/04/2023

Breakout Room Assignments

Room 1:

Administrative Scenario:

When reviewing financial assurance of an operator, you discover the Letter of Credit was expired. You do not have a renewal letter.

Assignment:

1. Identify any violations that may have occurred
2. Describe what you would do

Room 2:

Administrative Scenario:

An Operator fails to submit an annual report. When you contact them about it, they tell you they “lost the lease” and the landowner won’t let them on the site.

Assignment:

1. Identify who is responsible for reclamation.
2. Identify any violations that may have occurred.

Room 3:

Administrative Scenario:

When reviewing GIS data of an un-reclaimed area, you discover the NMM is in a neighboring parcel not included in the permit boundary.

Assignment:

1. Identify any violations that may have occurred
2. Describe what you would do

Room 4:

Administrative Scenario:

When sending out annual report and fee statements, an operator says they sold the site to another operator.

Assignment:

1. Identify any violations that may have occurred
2. Describe what you would do

Room 5:

Environmental Scenario:

An operator says they are done mining and wants to be released. When you inspect the mine for completion, you see solid waste, weeds growing in stockpiles, and no topsoil applied to the site.

Assignment:

1. Identify any violations that may have occurred
2. Describe what you would do

Room 6:

Environmental Scenario:

You receive a complaint that material was being trucked in and buried in the pit. Upon inspection and discussion with the operator, you find material from a dug-out basement at a nearby residential neighborhood. The reclamation plan does not mention the use of fill in reclamation.

Assignment:

1. Identify any violations that may have occurred
2. Describe what you would do

Room 7:

Environmental Scenario:

During a routine compliance inspection, you observe preparations for highwall extractions/blasting, but don't see where topsoil was placed. The operator points to a small stockpile off to one side. The reclamation plan says the site has "plenty of topsoil" to be used for reclamation and that 6 inches of topsoil will be spread over all slopes.

Assignment:

1. Identify any violations that may have occurred
2. Describe what you would do

Room 8:

Environmental Scenario:

Upon routine compliance inspection of an inactive site, you see a 40-foot highwall with vertical and horizontal cracks and young trees growing in the crevices. There is a farm field at the top of the highwall with corn crops growing within 10 feet of the edge and the pit floor is a gravel base being used to store timber.

The reclamation plan calls for 3:1 slopes in place of the highwall and a fence along the perimeter. The floor of the pit will be used for agricultural purposes.

Upon discussion with the operator, they tell you they haven't mined in 5 years and don't think they will this year either. You are also told the landowner let a logger use the site to stage timber.

Assignment:

1. Identify any violations that may have occurred
2. Describe what you would do