



Minerals 3600 Mine and Reclamation Inspection
U.S. Department of the Interior
Bureau of Land Management
Royal Gorge Field Office



The BLM has conducted an inspection of your operations, which concludes whether the documented operations on file with BLM are compliant or noncompliant. Any non-compliance issues are reported in the Additional Actions Necessary section of this inspection.

Operation Type: Surface – continual Surface – intermittent Underground

Date: 12/19/2018 Time: 8:55 a.m. Weather: Sunny	Operation Name: T.H.E. Aggregate Source Operator: Tezak Heavy Equipment Case Number: COC-074982 CDRMS #:
<p align="center"><u>Attendees</u></p> BLM: S. Carter and A. Sanderson Operator(s): Lu Toxvard and Randy DiLuzio Other(s): None	<p align="center"><u>General</u></p> Operation(s) are in compliance with documentation on file <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A Operation(s) and disturbance on-site coincide with the operations and access on file <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A

Inspection Purpose: Pre-Operations General Final Trespass Complaint

Inspection Items	Compliant	Non-Compliant	N/A
1. Method of Operations			
Hardrock Quarry, Pit, Other			
a. Hardrock Quarry <input type="checkbox"/> N/A <ul style="list-style-type: none"> • Operations Equipment <input checked="" type="checkbox"/> • Processing Equipment <input checked="" type="checkbox"/> • Blasting <input checked="" type="checkbox"/> Internal <input type="checkbox"/> External • Interim Benches <input checked="" type="checkbox"/> • Final Benches <input checked="" type="checkbox"/> • Working Floor <input checked="" type="checkbox"/> 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Pit <input checked="" type="checkbox"/> N/A <ul style="list-style-type: none"> • Operations Equipment <input type="checkbox"/> • Processing Equipment <input type="checkbox"/> • Slopes <input type="checkbox"/> 	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Other <input checked="" type="checkbox"/> N/A <ul style="list-style-type: none"> • Operations Equipment <input type="checkbox"/> • Processing Equipment <input type="checkbox"/> 	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. Site Conditions			
a. Material/Waste Rock Management	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Erosion & Stormwater Control	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Man-made Structures	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Weed Management	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. Safety Hazards	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f. Interim Reclamation	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Inspection Items	Compliant	Non-Compliant	N/A
3. Housekeeping			
a. Container Management	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Spills/Leaks Observed	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Hazardous Substances/POL Management	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. General Housekeeping	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4. Access			
a. Road Management	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Berms	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Security	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Signage	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. Surface Water Controls	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5. Quality Assurance/Quality Control			
a. Routine Site Conditions Monitoring	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Air, Water, Noise, Other Monitoring	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Monitoring Reporting	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Regulatory Submittals	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. Other Agency/Entity Permits	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7. Final Reclamation	<input checked="" type="checkbox"/> N/A		
a. Exploration/Sampling Location	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Access Roads/Trails	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Grading	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Revegetation	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. Removal of Structures	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f. Free of Trash	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Additional Actions Necessary

Non-Compliance Issues to be addressed by Operator

None

Final Notes

Inspection Objectives:

1. Weed Control Plan
2. AST diesel tank storage and spill plan
3. Safety Data Sheets (SDS) sheet
4. Shop/Chemical/POL storage

Objective Items:

ITEMS THAT NEED TO BE ADDRESSED BY OPERATOR

ITEMS THAT NEED TO BE GIVEN TO THE OPERATOR BY BLM

1. Weed Control Plan

- Operator spot sprays noxious weeds in reclamation and other disturbed areas; uses the county CUP guidelines for noxious weed control (primarily concerned with List A and B type weeds).

- Most recent Fremont Co inspection (6 years ago) determined adequate noxious weed control

2. AST diesel tank characteristics

- **BLM needs a copy of the SPCC plan.**
- The operator had the AST tank first inspected in 2016 by Industrial Inspectors This initial inspection checked for internal leaks/spills and tank failure prior to utilization.
- Operator has a SPCC plan on site which is regulated and inspected by MSHA (not OSHA).
 - 3 ASTs documented in the SPCC plan. At this time, only 1 AST for use of on-road diesel is present, however the operator plans to acquire the other 2 ASTs for off-road diesel and gasoline sometime in the future.
- MSHA inspects the tank for safety, but not necessarily integrity, therefore the operator visually inspects the tank monthly for potential leaks/spills.
- The tank is not subject to State regulation and inspection by Colorado Division of Oil and Public Safety (OPS). The county fire chief has also categorized the AST as exempt.
- AST properties:
 - Secondary containment: double-walled
 - 1 output nozzle
 - 14,539 gallon or 55,000 L tank
- A bleach spray bottle located on the western end of the storage portion of the tank was labeled on-site. **The operator needs to check that all chemicals are appropriately labeled and OSHA's Hazard Communication Standard is being adhered to, as applicable.**
- Spill diversion/containment: Earth and drainage channel system to a series of containment ponds with an impervious granite liner with no assumed fractures. There are two spill flow paths:
 - One involves a series of three stormwater/spill containment ponds, which start approximately 30-feet from the tank. This is a closed system, however the last pond in series does include a spillway.
 - The second tends to follow the road footprint and includes one stormwater/spill containment pond with a series of check dams. The stormwater/spill would go through a series of check dams prior to being contained in a pond with a rip-rap spillway. The containment pond has been recently cleaned (scrape marks present).

3. SDS sheet

- Information was emailed to BLM post-inspection. All SDS sheets are compiled in a manual, by category, and stored in the back of the maintenance shop by the eyewash station for quick access.

4. Chemical/Shop/POL storage (ref. images 1-10)

- The only chemicals stored on the working floor (private lands) or within the permitted boundary are the following: AST tank, bleach and household cleaning products. All other chemicals are stored in the maintenance shop located on the lower storage area outside the permit boundary on private lands. No chemicals are stored on BLM lands. The maintenance shop is the primary shop for all Tezak Heavy Equipment and includes activities not pertaining to the quarry.
- **Material/Waste Storage:**
 - Material storage is located in the covered locked shed outside of the maintenance shop. All chemical drums/containers are appropriately labeled.
 - There is no waste oil heater in the maintenance shop. Therefore, it is stored in a steel tank with secondary containment (steel shed cover with a platform) outside the maintenance shop, until it can be picked up by a 3rd party for recycle. Solvent secondary materials, POLs, coolant and DEF totes are all disposed of in the waste oil

container. All these fluids are vacuumed out from the shop into this primary waste oil container.

- A 3rd party contractor [REDACTED] hauls and disposes all used oil/other waste fluids off-site. The contractor tests all waste fluids prior to hauling off-site, including spent solvents. The fluid is pumped when the container is full instead of hauling entire container off-site.
- Other maintenance materials are stored throughout the maintenance site. Label all containers with the type of waste product. Recycle empty metal and poly drums, as needed.
- Storage of materials in the maintenance shop include the following:
 - Solvent tank
 - Brake wash
 - Methanol
 - Torque fluid
 - Waste Oil
 - Locker with standard fluid cans (operator throws away when empty)
 - Paint cans
 - Ether
 - Batteries (new batteries are dropped off by [REDACTED]; spent batteries are disposed (closed-loop system) of by [REDACTED])
- No secondary containment for the waste coolant drums, stored outside near the waste oil storage containers. Operator needs to construct secondary containment, cover all waste material and appropriately labeled.
- Email/Mail operator information on waste disposal information.
- It does not appear that T.H.E. Aggregate Source operations are subject to TRI reporting.
- The mine site and maintenance shop are inspected and regulated by MSHA (been under MSHA regs for the last 3 years).

Proprietary Information:

None

Date inspection shared with CDRMS: 2/28/2019

Date inspection shared with Operator: 2/28/2019

Images

Image 1-10:





Maintenance shop with chemical storage location. Ref. final notes section #4 for details.