0008

Document Information Form

Mine Number: C/007/033

File Name: Internal

To: DOGM

From:

Person N/A

Company United States Department of the Interior

Date Sent: N/A

Explanation:

Mine Site Evaluation Inspection Report

cc:

File in:
C/ 007 , 033 , Internal
Refer to:
- ☐ **Confidential**
- ☐ **Shelf**
- ☐ **Expandable**

Date _____ For additional information

File ACT/007/033 #5
Copy Jose, RM

United States Department of the Interior
Office of Surface Mining
Mine Site Evaluation Inspection Report

For Office Use Only

1a (Y Y M M): | 1b (Batch): | 1c (Report):

2. Name of Permittee: ANDALEX RESOURCES INC
3. Street Address: PO BOX 902
4. City: ORE
5. State: UT
6. Zip Code: 84501
7. Area Code: 801
8. Telephone Number: 637-5385
9. MSHA Number: 42-01864-
10. Date of Inspection (Y Y M M D D): 920602
11. State Permit Number: ACT/007/033
12. Name of Mine: WILDCAT LOADOUT
13. County Code: 007
14. State Code: UT
15. Strata:
16. State Area Office:
17. OSM Field Office No.: 02
18. OSM Area Office No.: /
19. OSM Sample No.: 0087
20. Type of Inspection (Code): C
21. Joint Inspection: Yes [X] No [ ]
22. Inspector's ID No.: 387

23. Status

A	01	Type of Permit
B	AC	Mine Status (Code)
C	21	Type of Facility (Code)
D	91.0	Number of Permitted Acres
E	60.0	Number of Disturbed Acres

24. Type of Activity (check applicable boxes)

A	[ ]	Steep Slope	E	[ ]	Anthracite
B	[ ]	Mountain Top Removal	F	[X]	Federal Lands
C	[ ]	Prime Farmlands	G	[ ]	Indian Lands
D	[ ]	Alluvial Valley Floors	H	[ ]	Other

25. Performance Standards (Codes)

Instructions: Indicate compliance code. For any standard marked 2 or 3 provide narrative to support this determination.

Standards That Limit the Effects to the Permit Area

A	1	Distance Prohibitions
B	2	Mining Within Permit Boundaries
C	1	Signs and Markers
D	2	Sediment Control Measures
E	2	Design and Certification Requirem[illegible] Sediment Control
F	1	Effluent Limits
G	1	Surface Water Monitoring
H	3	Ground Water Monitoring
I	3	Blasting Procedures
J	1	Haul/Access Road Design and Mainte[illegible]
K	2	Refuse Impoundments
L	2	Other: Specify Impoundments

Standards That Assure Reclamation Quality and Timeliness

M	1	Topsoil Handling
N	1	Backfilling and Grading
O	1	Fo[illegible] Schedule
		[illegible]nts
		Materials
	2	Cessation of Operations: Temporary
W	2	Other Coal Waste Disposal

File in:
[ ] Confidential
[ ] Shelf
[ ] Expandable
Refer to Record No 0008 Date ____
In C/007, 033, Internal
For additional information

File ACT/007/033 #5
Copy Jose, BLM

United States Department of the Interior
Office of Surface Mining
Mine Site Evaluation Inspection Report

For Office Use Only

1a (Y Y M M):
1b (Batch):
1c (Report):

2. Name of Permittee: ANDALEX RESOURCES INC
3. Street Address: PO BOX 902
4. City: PRICE
5. State: UT
6. Zip Code: 84501
7. Area Code: 801
8. Telephone Number: 637-5385
9. MSHA Number: 42-01864-
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C		Prime Farmlands	G		Indian Lands
D		Alluvial Valley Floors	H		Other

25. Performance Standards (Codes)

Instructions: Indicate compliance code. For any standard marked 2 or 3 provide narrative to support this determination.

Standards That Limit the Effects to the Permit Area

A	1	Distance Prohibitions
B	2	Mining Within Permit Boundaries
C	1	Signs and Markers
D	2	Sediment Control Measures
E	2	Design and Certification Requirements—Sediment Control
F	1	Effluent Limits
G	1	Surface Water Monitoring
H	3	Ground Water Monitoring
I	2	Blasting Procedures
J	1	Haul/Access Road Design and Maintenance
K	2	Refuse Impoundments
L	2	Other: Specify Impoundments

Standards That Assure Reclamation Quality and Timeliness

M	1	Topsoil Handling
N	1	Backfilling and Grading
O	1	Following Reclamation Schedule
P	1	Revegetation Requirements
Q	2	Disposal of Excess Spoil
R	1	Handling of Acid or Toxic Materials
S	2	Highwall Elimination
T	2	Downslope Spoil Disposal
U	2	Post Mining Land Use
V	2	Cessation of Operations: Temporary
W	2	Other Coal Waste Disposal

File ACT/007/033 #5

United States Department of the Interior
Office of Surface Mining
Mine Site Evaluation Inspection Report

26. State Permit Number ACT/007/033

27. Date of Inspection (Y Y M M D D) 920602

28. Yes ☑ No ☐ Do mining and reclamation activities on the site comply with the plans in the permit? If no, provide narrative to support this determination.

29. Indicate number of complete and partial inspections conducted by the State to date for this annual review period:

29a. 03 Number of Completes 29b. 09 Number of Partials

30. Indicate number of complete and partial inspections required by the State during this annual review period:

30a. 04 Number of Completes 30b. 09 Number of Partials

31. Has inspection frequency been met?

	Yes	No			Yes	No	
31a.	☒	☐	Completes	31b.	☒	☐	Partials

32. FEDERAL ENFORCEMENT INFORMATION. [Enter violation number. Check appropriate box(es)]

	Ten-Day Notice No.	Notice of Violation No.	Cessation Order No.	Violation Codes
A				Authorizations to Operate
B				Signs and Markers
C				Backfilling and Grading
D				Highwall Elimination
E				Rills and Gullies
F		C/007/033		Improper Fills
G				Topsoil Handling
H				Sediment Ponds
I				Effluent Limits
J				Water Monitoring
K				Buffer Zones
L				Roads
M				Dams
N				Blasting
O				Revegetation
P				Spoil on the Downslope
Q	N/A			Mining Without Permit
R				Exceeding Permit Limits
S				Distance Prohibitions
T				Toxic Materials
U				Other Violations

United States Department of the Interior

Mine Site Evaluation Inspection Report

33. Name of Authorized Representative *(print or type)* James R. Smith

Signature of Authorized Representative — Date 6-16-92

Signature of Reviewing Official — Date 6-30-92

16 0
13 0
07 5
08 0

INSPECTION REPORT NARRATIVE

INSPECTION DATE: June 2, 1992

MINE NAME: Wildcat Loadout

PERMIT NUMBER: ACT/007/033

COMPANY NAME: Andalex Resources, Inc.
P.O. Box 902
Price, UT 84501
(801) 637-5385

INSPECTOR NAME: James B. Smith

INSPECTION TYPE: Complete Random Sample Oversight Inspection

PERSONS PRESENT DURING INSPECTION:

Jess Kelley, Inspector, Utah Division of Oil, Gas and Mining (DOGM)
Mike Glasson, Environmental Coordinator, Andalex Resources, Inc.
John Pappas, Andalex Resources, Inc. (for part of inspection)

WEATHER: Clear, mid-80's

GENERAL INFORMATION

This coal processing facility is located approximately 3 miles west of U.S. Highway 6 on the Consumers Road (Rt 139) in Carbon County, Utah near the community of Helper. The permit area is located on the Standardville Quadrangle. This facility receives coal via truck from a nearby underground mine. The coal is screened and sized at this facility and then loaded for shipment by rail. Although coal was not being loaded on this particular date, coal was being trucked to the site and stockpiled.

A review of the permit documents revealed the following:

> Wildcat Loadout has been operational since April 2, 1985. The Division of Oil, Gas and Mining (DOGM) issued the mining permit on May 5, 1989, to expire on May 5, 1994. The life of the facility is estimated to be 30 years. The permit area is located on Federal lands administered by the Bureau of Land Management (BLM). Most if not all of the permit area was previously disturbed by loadout activities conducted by Swisher Coal Company.

The predominant soil type within the permit area is Mancos shale. The predominant plant community is sage-grass, changing to pinion-juniper near the western border of the permit.

The average rainfall for this area is 9 inches per year. There are no perennial streams within the permit area; all runoff is in direct response to precipitation. All runoff from the permit area flows into Garley Canyon 3/4 mile from the permit area, and then into the Price River 3 1/2 miles away. The nearest sources of water in the area are a small spring in Garley Canyon adjacent to the railroad tracks approximately 1/2 mile southwest of the permit area, and the Gordon Creek drainage located approximately 1 1/2 miles to the south. Ground water studies indicate that there is no ground water present within 60 feet of the surface in the permit area.

The premining land use in this area was wildlife habitat and grazing. The proposed postmining land use is the same.

There are no prime farmlands, alluvial valley floors, or lands unsuitable for mining within the permit area. There are also no significant cultural or historic resources or threatened or endangered species within the permit area.

ADMINISTRATIVE REQUIREMENTS

Based on a review of documents at the Albuquerque Field Office, the DOGM office, and at the mine site, the status of administrative requirements is as follows:

The current permit was issued on May 5, 1989, for a 5-year term to expire on May 5, 1994. There were 5 stipulations at the time of permit issuance, all of which have been resolved. A permit condition imposed at the time of permit issuance was that the operator would implement a wildlife habitat enhancement plan in an area as designated by BLM outside the lease area. The purpose of this was to offset the temporary loss of critical winter range within the lease area during mining operations. A letter dated February 26, 1990, in the Andalex file from BLM indicates that the enhancement plan was successfully completed.

DOGM completed a mid-term permit review on November 22, 1991. As a result of this review, the operator was required to: (1) submit an operational plan for testing leachate and coal waste material from the coal waste pile for specified parameters; (2) submit an appropriate air quality approval order from the Utah Department of Health; and (3) conduct an erosion pin study in specified diversion ditches because the "PAP does not

accurately represent conditions in the field and it is not possible to determine the design of each ditch, culvert inlet or outlet . . ." (DOGM file memorandum dated January 22, 1992, and transmitted to the operator by letter dated January 28, 1992). The operator resolved submitted the required Air Quality Approval Order. On January 28, 1992, DOGM issued Notice of Violation (NOV) No. 92-32-2-2 for (1) failure to analyze leachate and coal waste material; and (2) failure to conduct the erosion pin study. Violation 1 of 2 was terminated on March 10, 1992, based on information submitted. Violation 2 of 2 was also terminated on this same date because "the operator explained why the erosion pin study was not conducted and provided and has provided descriptions and designs for the erosion control measures implemented on site." (lining ditches with half-round culverts, belt lining etc.) At the operator's request, an informal hearing was conducted to review these two violations. As a result, violation 1 of 2 was upheld and violation 2 of 2 was vacated. Therefore, all issues resulting from the mid-term permit review are apparently resolved at this time.

The performance bond for this operation is in the form of an irrevocable letter of credit held by the Citizen's Fidelity Bank in the amount of $813,795, effective February 24, 1992. The bond was previously held by the Pittsburgh National Bank. Bonding documents were in order.

The operator has a current certificate of liability insurance which is due for renewal on July 1, 1992. The form of the certificate appeared appropriate with the required limits of liability.

Ownership and control information contained in the Office of Surface Mining Reclamation and Enforcement's (OSM) Applicant Violator System matches that contained in DOGM's current permit file.

SITE INSPECTION

After presenting my credentials, I inspected the permit area with the persons listed above for compliance with the State program and the approved permit. The results of the inspection are as coded on page 1, Section 25, of the Mine Site Evaluation Inspection Report. Narrative supporting the determinations by performance code are as follows:

B. Mining Within Permit Boundaries

The westernmost section of diversion ditch UD-1 is not included within the permit area as delineated on Plates 1 and 2. This section of the ditch was constructed after issuance of the permit. Also, the sections of the permanent impoundment depicted on Plate 18 that are west of the haulroad are outside the

permit area as delineated on Plates 1 and 2, even though the disturbed area markers in the field encompass this area. The impoundment was modified in 1991 by adding spillways and apparently regrading the embankment. Section R645-300-141 of the approved State program states that the permittee will conduct coal mining and reclamation operations only on those lands that are specifically designated as the permit area. This violation is considered a permit defect because certain parts of the approved permit address these structures even though they are not included within the permit area. Resolution of this permit defect is discussed in the Close-Out Summary.

D. Sediment Control Measures

The permit includes approximately 14 acres of area that is designated as small area exemptions (SAE's). The State program at R645-301-742.240 provides for the approval of SAE's (exemptions to the requirements for siltation structures) if the disturbed drainage area within the total disturbed area is small, and the operator demonstrates that siltation structures and alternate sediment control measures are not necessary for drainage from the disturbed areas to meet the effluent limits under R645-301-751 or the applicable Utah and Federal water quality standards for the receiving waters. The permit does not include such a demonstration pursuant to this section. In fact, the permit provides for the use of alternate sediment control measures in some areas of these SAE's; specifically, berms around the topsoil stockpiles and straw bale dikes in the drainages below ponds "B" and "C." The drainage area around and below pond "B" is particularly a problem because of the collection of wind-blown coal fines that are deposited in this area and are eventually consolidated in the drainage. The dikes below pond "B" appear to be somewhat effective in containing the coal fines, although a full evaluation of their effectiveness could only be judged through observations during precipitation events and periods of high winds.

The absence of demonstrations in the permit to support the SAE designations is considered a permit defect. Resolution of this permit defect is discussed under the Close-Out Summary.

E. Design and Certification Requirements - Sediment Control

This operation employs approximately 37 diversion ditches for diverting flow through and around the disturbed areas. The locations of these ditches are shown on Plate 2. In addition to maps, the State

program at R645-301-512.140 and R645-301-722.200 also requires designs and cross-sections for diversion ditches that are certified by an RPE. The permit includes designs and cross-sections for diversion ditch UD-1 that are certified by a registered professional engineer. Designs and cross-sections for all other ditches are not contained in the approved permit. Tables IV-12, IV-13, and IV-13A provide partial methods and calculations to arrive at a minimum cross-sectional area to be maintained in each ditch, and this minimum cross-sectional area is specified in the tables. However, if these tables are intended to serve as the design, they should be certified by an RPE but they are not. While the tables provide a minimum cross-sectional area, they do not address the required ditch configuration. Even if the tables were certified, cross-sections would still be required to fully satisfy the regulatory requirements.

The permit is defective in that it was approved without the inclusion of certified designs and cross-sections for the diversion ditches. Resolution of this permit defect is as stated in the close-out summary.

H. Ground Water Monitoring

Prior to approval of the permit, the operator drilled 8 test wells ranging in depth from 45 to 60 feet. The operator monitored these wells for the occurrence of ground water but none was detected. Because of these test results, because the operation is a surface facility only, and because the geology of this area indicates the absence of ground water in this area, the approved permit does not include a ground water monitoring program.

I. Blasting Procedures

Blasting does not occur at this coal processing facility.

K. Refuse Impoundments

There are no refuse impoundments associated with this operation.

L. Other - Impoundments

The area designated for coal storage in the truck dump area west of the railroad tracks is actually a large impoundment. This area can be located on Plate 1 and Plate 2. The permit identifies and provides designs

for a permanent impoundment immediately west of this area, but it fails to recognize that the designed impoundment discharges into this other, larger impoundment designated for coal storage. The railroad track embankment actually serves as the impounding structure for this area. The State program requires design and certification of all impoundments (R645-301-743). The absence of this design is a permit defect for which resolution is discussed in the Close-Out Summary.

Plate 18 contains the design for the permanent impoundment immediately west of the aforementioned undesigned "coal stockpile impoundment." Section R645-301-512.240 states that an RPE must certify the design of impoundments according to R645-301-743. While the design contained on Plate 18 is certified, the certification statement is much more general than that required by regulation, stating, "I ... certify that this map represents the Permanent Impoundment and Depression Area." Acceptance by the regulatory authority of this certification statement in lieu of the certification required by the state program is a permit defect for which resolution is discussed in the close-out summary.

M. Topsoil Handling

During the course of the inspection it was noted that topsoil pile "F" did not have a topsoil marker as required by R645-301-521.270. The operator immediately secured and erected the required marker. Because the violation was immediately corrected and the event for which the performance standard was designed to prevent had not occurred, no action was necessary.

Q. Disposal of Excess Spoil

There are no excess spoil disposal activities associated with this operation.

S. Highwall Elimination

This performance standard is not applicable to this operation at this time.

T. Downslope Spoil Disposal

There are no downslope spoil disposal areas associated with this operation.

U. Post Mining Land Use

The operation is still active; therefore, this performance standard is not applicable at this time.

V. Cessation of Operations: Temporary

This standard does not apply to this active operation.

W. Other - Coal Waste Disposal

The operator utilizes a refuse pile for the disposal of coal processing waste material. This refuse pile is located in the western part of the permit. The location is designated on Plate 1. This material consists of rock that is removed from lump coal. At the time of this inspection, the refuse pile was approximately 90 yards long, 25 yards wide, and 4 feet deep. The operator stated that they had been placing material in the pile for about 6 years. Surface water is diverted around and away from the pile by diversion ditches UD-1 and D-17. No material was being placed in the pile during the inspection nor was any compaction or grading activities taking place at that time. The waste material appeared to be well-compacted. Quarterly inspections are conducted by an RPE for construction, maintenance, stability, and safety hazards.

Page 146 of the approved permit describes the refuse pile in general terms. It is not clear from the permit language how much material will be placed in the pile, whether it will be covered as is, moved to fill a pit, or removed from the site altogether. It appears from the permit language that disposal is contingent upon the outcome of testing to determine if the material is acid- or toxic forming, which was the subject of a deficiency noted by DOGM during the mid-term permit review and previously discussed in this report. The permit does not include any certified designs or cross-sections for this refuse pile.

Section R645-301-536 of the State program addresses the requirements for coal mine waste, including coal processing waste and refuse piles. This section includes the requirements that all coal mine waste disposal facilities have designs and cross-sections that are certified by an RPE. In addition to these requirements, if a coal processing waste bank is to be removed, the permit is to include a timetable and plans for removal pursuant to R645-301-542.500. The permit is deficient in that it contains no certified designs or cross-sections for the coal mine waste disposal facility. If the material is to be removed at some point, the permit should also include a timetable and plans for removal. Resolution of this

permit defect is discussed under the Close-Out Summary.

Close-Out Summary

I traveled to the DOGM office in Salt Lake City, Utah on June 3, 1992, to discuss the inspection findings. I met with Jess Kelley and Tom Munsen. Following is the disposition of the observed permit defects:

(1) Affected areas not included in the permit.

DOGM stated that it would issue a Revision Order requiring the permittee to revise the permit to include within the permit boundaries the upper part of diversion UD-1 and that part of the permanent impoundment west of the haul road.

(2) No demonstrations for SAE's.

DOGM stated that it would issue a Revision Order to require the permittee to: (1) either submit the required demonstrations for the SAE's; or (2) identify and design siltation structures or alternate sediment control measures to be used as the best technology currently available for sediment control for these areas.

(3) No certified designs and cross-sections for diversions.

DOGM stated that it would issue a Revision Order requiring the permittee to submit certified designs and cross-sections for all diversions except for UD-1 (designs and cross-sections for UD-1 are already included in the permit).

(4) No certified design for the "truck dump coal stockpile" impoundment.

DOGM stated that it would issue a Revision Order requiring designs for this impoundment.

(5) Inadequate certification for the permanent impoundment design - Plate 18.

DOGM stated that it would issue a Revision Order requiring the permittee to recertify the design according to Section R645-301-512.240.

(6) No certified designs and cross-sections for the coal mine waste disposal facility.

DOGM stated that it would require these designs through a Revision Order.

It was agreed that DOGM would allow 30 days under the Revision Orders for the permittee to submit the required permit revisions, and that DOGM would complete its review of the revisions within 30 days after receipt. DOGM stated that a second round of review may be necessary if it identifies deficiencies in the revision submittals. DOGM stated that it would telefax a copy of the Revision Orders to the Albuquerque Field Office after they are written, probably by Wednesday of next week (June 10, 1992).

Because DOGM agreed to take actions necessary to correct the identified permit defects, issuance of a Ten-Day Notice was not necessary. It should be noted, however, that OSM Directive INE-35 requires that OSM's deference to State action in regard to permit defects must be based on the resolution of the identified permit defects within a reasonable timeframe. This timeframe is not to exceed 30 days for the operator to submit an application for permit revision, and not to exceed 30 days for review and approval or disapproval by the regulatory authority. The exception to this is where the regulatory authority identifies an exceptional circumstance that would require a longer period of time to approve or disapprove the application for revision (OSM Directive INE-35, page 12, section 5 - Addressing Permit Defects). Unnecessary delays on the part of the permittee in submitting an accurate and complete revision application would not constitute an exceptional circumstance requiring a longer period of review, nor would unnecessary delay on the part of the regulatory authority in reviewing the revision materials.

It should be noted that OSM Directive INE-35 also requires that OSM's deference to State action in regard to permit defects must be based on the establishment of a schedule consistent with the State program equivalent of 30 CFR 843.12 for remedial actions required to bring the operation into compliance with the permit as revised. Due to the nature of the permit defects identified, remedial actions, if any, can not be determined prior to approval of the required permit revisions. If remediation is needed, DOGM must establish a reasonable time schedule upon approval of the permit revisions.

This concluded the inspection.

NAME OF AUTHORIZED REPRESENTATIVE: James B. Smith

SIGNATURE:

DATE: JUNE 10, 1992

WILDCAT LOADOUT

OFFICE OF SURFACE MINING RECLAMATION AND ENFORCEMENT
RANDOM SAMPLE MEIR SUPPLEMENT

1. Permittee Andalex Resources, Inc
2. Permit Number ACT/007/033
3. Joint Inspection | Y | Y/N
4. Date 06-02-92
5. Days since Last State Complete Inspection (LSCI) 118
6. Block 25 Categories in NON-COMPLIANCE this RSI 6
7. Total Violations this RSI 7

****

8. List (only once) all violations:
   1) where State enforcement was required and taken during the LSCI;
   2) recorded in the LSCI report but the State failed to take enforcement;
   3) observed during this RSI which clearly existed during the LSCI but the State failed to take enforcement; and
   4) existing during this RSI which are not already listed under one of the categories above.

	A SPECIFIC STATE LAW/REGULATION VIOLATED	B BLOCK 25 CATEGORY	C ABATED (Y/N)	D STATE ACTION	E REASON IF UNCITED	F CAUSE	G SERIOUSNESS PEO	H SERIOUSNESS IMPACT	I OSMRE ACTION	J OPTIONAL	K OPTIONAL
1	R645 301 521.270	M	Y	4		4	1	1	5		
	Description: Topsoil Marker										
2	R645, 300, 141	B	N	5		1	1	4	1		
	Description: Areas Affected Outside Permit										
3	R645 301 742.240	D	N	5		1	3	1	1		
	Description: No Demonstrations for SAE's										
4	R645-301-512.140, 722.200	E	N	5		1	2	1	1		
	Description: No certified designs and cross-sections for diversions										
5	R645-301-743	L	N	5		1	1	1	1		
	Description: No Design for coal stockpile impoundment (Truck dump area)										
6	R645-301-512.240	L	N	5		1	1	1	1		
	Description: Inadequate certification for permanent impoundment design - Plate 18										
7	R645-301-512, 536	W	N	5		1	1	1	1		
	Description: No certified cross-sections and designs for the coal mine waste disposal facility.										
8											
	Description:										
9											
	Description:										
10											
	Description:										

STATE ACTION
1) Existed on LSCI, cited
2) Existed on LSCI, not cited
3) Cited Prior to LSCI, Abatement Pending
4) Occurred since LSCI
5) Permit defect

STATE'S REASON FOR NOT CITING VIOLATION (AFTER DISCUSSION WITH THE STATE)
1) Not a Violation
2) Precluded by State Policy
3) Not included under State Program
4) Warning given in lieu of a Citation
5) Violation not recognized (missed)
6) Practice allowed under approved Permit
7) Too minor to cite
8) Working with Operator to Correct
9) Other:

CAUSES
1) Permit Defect
2) Unusual Weather Conditions
3) Unofficial Waiver
4) Operator Negligence
5) Other:

PROBABILITY OF EVENT OCCURRENCE
1) None or Unlikely
2) Likely
3) Occurred

IMPACT
Damage Remains Within the Permit Area
1) None or Minor
2) Moderate
3) Considerable
Damage Extends Beyond the Permit Area
4) None or Minor
5) Moderate
6) Considerable
Obstruction to Enforcement
7) None or Minor
8) Moderate
9) Considerable

OSMRE ACTION
1) Deferred to State Action
2) TDN issued
3) IH-CO issued
4) Previously Cited, Abatement Pending
5) Abated during or before OSMRE Inspection
6) TDL issued
7) TDN Issued for Permit Defect