



U.S. Environmental Protection Agency, Region 4
61 Forsyth Street SW, Atlanta, GA 30303
Water Compliance Inspection Checklist

FACILITY DATA

NPDES ID: ALG850067	Effective Date: 12/04/2023	Expiration Date: 05/31/2027
Facility Name: Sardine Pit North		SIC Code: 1442
Address: Alger Road Flomaton, AL 36441		
Mail: 8 East Quintette Road, Cantonment, FL 32533		
On-Site Representatives: Michael Campbell – Owner, American Concrete Supply Scott Campbell – Vice President, American Concrete Supply Paul Bell – Site Manager, American Concrete Supply Ben White – Tensaw Engineering Neil Johnston – Attorney Sean O’Toole – Biome		Responsible Official, Title, Phone Number, Mailing Address: Scott Campbell – Vice President scott.campbell@acs-office.com (850) 968-1515

INSPECTION ENTRY DATES/TIMES

Entry Date/Time: 1/30/2024 / 09:30 AM	Exit Date/Time: 1/31/2024 / 16:45 PM
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NAMES OF EPA AND STATE INSPECTORS

EPA Inspectors: Lonnie Dorn, Chris Parker, Jeremy Judd, and Blaine Preston
EPA Contract Inspectors: Kort Kirkeby and Kate Forsmark
ADEM Inspectors: Ange Boatwright and Robert Glover

AREAS EVALUATED DURING INSPECTION (Check those areas evaluated)

X	Permit		Self-Compliance Program		Pretreatment
X	Records/ Records		Compliance Schedule	X	Pollution Prevention
X	Facility Site Review		Laboratory	X	Stormwater
X	Effluent/ Receiving Waters	X	Operations & Maintenance		Combined Sewer Overflow
	Flow Measurement		Sludge Handling/ Disposal		Sanitary Sewer Overflow

BACKGROUND

Sardine Pit North (the Facility) is a sand and gravel mine operated by South Alabama Materials. The Facility is bordered by Big Escambia Creek to the East and Robinson Creek to the south (refer to [Image 1](#), below). The Facility is approximately 550 acres in total size with approximately 50 acres of disturbed area at any time. Sardine Pit South and Sardine Pit North comprise the entire 550 acres owned by South Alabama Materials. The Facility originally obtained NPDES permit coverage in 2014 and the permit was renewed in 2017. The Facility’s 2017 permit coverage expired on March 31, 2022, and was not renewed until December 4, 2023.

The permittee started Facility mining operations in Sardine Pit South (Permit # AL850066), located south of Robinson Creek (refer to [Image 2](#), below). Mining operations in Sardine Pit South began in approximately 2003 and ceased in 2015, according to the Facility representatives. Following mining operations, the Sardine Pit South was reportedly reclaimed through revegetation. Although operations ceased at Sardine Pit South in 2015, the operator submitted discharge monitoring reports (DMRs) for three outfalls through June 2022, reporting no discharge on all DMRs during this period. Alabama Department of Environmental Management (ADEM) administratively closed out the operations at Sardine Pit South site on July 12, 2022.

At the time of the inspection the permittee was mining the Sardine North Pit, to the north of Robinson Creek.

In May 2022, a complaint was submitted to ADEM by an individual canoeing on Big Escambia Creek who observed a change in the water color from “pristine clear” to a “very hazy white clay color” when passing the mine. The individual noted that there was a “small stream/runoff from the gravel or sand operation taking place on the south side of the creek” where the color of the stream changed from clear to hazy white (refer to [Appendix A, Exhibit 1](#)). ADEM subsequently contacted the Permittee to inquire about a potential discharge, and the Permittee stated that “no evidence shows of any water leaving the site” and that “the creek is also as clean as it always is” (refer to [Appendix A, Exhibit 2](#)). There was no further action by ADEM following the complaint.

In June 2023, ADEM conducted a routine NPDES inspection of the Facility and observed a pipe leading from the settling pond and actively discharging from the settling pond through an active channel into Big Escambia Creek at Outfall 001E (refer to Appendix A, Exhibit 3).

ATTACHMENTS

Appendix A – Exhibit Log
 Exhibit 1 – May 2022 Complaint
 Exhibit 2 – Sardine Pit’s Response to the May 2022 Complaint
 Exhibit 3 - June 2023 ADEM Inspection Report
 Exhibit 4 – Discharge Monitoring Reports (February 2022 – July 2023)
 Appendix B – Photograph Log
 Appendix C – Figure Log

EPA REPRESENTATIVES

Inspector Signature/Name	Office/Phone Number	Date
AHMAD DROMGOOLE  Digitally signed by AHMAD DROMGOOLE Date: 2024.04.11 14:00:38 -04'00' Ahmad Dromgoole	US EPA Region 4/ECAD-WEB-WWES	
LONNIE DORN  Digitally signed by LONNIE DORN Date: 2024.03.27 11:01:35 -04'00' Lonnie Dorn	US EPA Region 4/ECAD-WEB-WWES	
 Kort Kirkeby	Eastern Research Group (US EPA Region 4 Contract Inspector)	March 15, 2024
 Kate Forsmark	Eastern Research Group (US EPA Region 4 Contract Inspector)	March 15, 2024

ALG850000 – Alabama NPDES General Permit for Non-Coal/Non-Metallic Aggregate Mining Worksheet

1. FACILITY LOCATION INFORMATION

GPS Coordinates	Latitude	31.186682		Longitude	-87.363700		
Receiving Water(s) or MS4	Big Escambia Creek	Site Acreage	50 disturbed acres 550 total acres	Weather Conditions	50's and sunny		
Date of current NOI	12/04/2024	SIC Code	1442 Construction Sand and Gravel	Date of Permit Coverage (1 wk after NOI date or immediate if previous permit coverage existed)	12/04/2024	Discharge to 303(d) listed or TMDL waters	No

2. POLLUTION ABATEMENT PLAN (PAP) INFORMATION

PAP TOPICS:	YES	NO	N/E
Part II.C.1.c - PAP is included in the Notice of Intent (NOI) submitted to ADEM	X		
Part IV.A.2 – The PAP is available onsite		X	
Part IV.A.2.a – PAP is certified by a registered PE licensed to practice in the State of Alabama, with date and signature	X		
Part IV.A.2.a(1) – The PAP includes the required information indicated in ADEM Admin. Code ch. 335-6-9: a) Name and address of the operator and a legal description of the area to be mined b) General information, including name and affiliation of company, number of employees, products(s) to be mined, hours of operation and water supply and disposition c) Topographic map showing location of mine, preparation plant, settling basin and all wastewater discharge points d) Method and plan for diverting surface water runoff from operational areas and mineral and refuse storage piles e) Narrative account of operation(s) explaining and/or defining raw materials, processes and products. Blockline or schematic diagrams indicating points of waste origin and its collection and disposal shall be included f) Quantity and characteristics of waste after treatment with respect to flow, suspended solids, total iron and pH g) Description of waste treatment facilities, pretreatment measures and recovery systems including expected life of sedimentation basins and schedules for cleaning or proper abandonment of such basins h) A plan to eliminate or minimize sediment and other pollutants from haul roads must be included and should meet minimum design criteria as established by the Guidelines in Appendix B i) Location of all streams in or adjacent to the mining area and those measures which will be taken to minimize the impact on water quality when the mining operation is located in close proximity to such streams. Such measures may include but not be limited to setbacks, buffer strips or screens. j) Measures to be employed to minimize the effect of any non-point source pollution which may be generated as a result of the surface mining operation. k) All pollution abatement facilities must be certified by the design engineer as being constructed in accordance with the approved plans l) The applicant shall specify if the proposed mining operation is to be constructed in the watershed of an impoundment classified as a public water supply or a direct tributary thereon.	X		
Part IV.A.2.a(1) – The PAP includes the required information indicated in ADEM Admin. Code ch. 335-6-9 Appendix A (Sedimentation Controls)	X		
Part IV.A.2.a(1) – The PAP includes the required information indicated in ADEM Admin. Code ch. 335-6-9 Appendix B	X		
Part IV.A.2.a(2) – The PAP includes a description of methods which will be implemented to prevent offsite vehicle tracking onto roadways and/or into ditches at the entrances and/or exits of the Permittee' s operations.	X		
Part IV.A.2.a(3) – The PAP includes a description of setbacks from waters of the State in units of linear feet on the horizontal plane; a description of the methods taken to visibly delineate setbacks from waters of the State; and a description of any other actions taken to prevent encroachment upon setbacks.	X		
Part IV.A.2.a(4) – The PAP includes a description of the methods used to delineate the boundaries of coverage under this Permit such that the boundaries are readily visible during the life of the operation		X	
Part IV.A.2.a(5) – The PAP includes a description of any other Best Management Practices (BMPs) which will be implemented to provide control of all nonpoint source pollution that is or may be associated with the Permittee' s operations	X		
Part II.C.d - Site Map (including boundaries of the Permit coverage, locations of treatment basins, discharge points, streams, etc.)	X		
Comments: The PAP was not available for review at the Facility at the time of the inspection. The PAP reviewed was obtained from the ADEM database. The PAP is dated December 7, 2021, and the Facility representatives stated that this was the current version of the PAP at the time of the inspection. The PAP did not include a description of methods used to delineate the permit boundaries. The Site Manager added that he was unaware of a PAP at the time of the inspection. Appendix A of the PAP includes a topographic map with the permit boundaries; however, there is no discussion on how the permit boundaries would be marked at the Facility.			

3. SITE DESCRIPTION and PAP

The Facility is an approximately 550 acre sand and gravel mine located in Escambia County, Alabama. The gravel pit is owned and operated by South Alabama Materials, Inc. The property is bordered by Robinson Creek to the south and Big Escambia Creek to the east and forested silviculture land to the west and north. The site is naturally graded from northwest to southeast, towards Big Escambia Creek. The Facility's main entrance is located on the western perimeter of Alger Road (refer to [Appendix B, Photograph 1](#)).

Operations at the Facility include stripping the topsoil, excavating the sand and gravel layer, running the materials through a sorter in the area referred as the wash plant, and hauling sand and gravel offsite. Most of the materials are sorted into sand product that the Facility can sell, and leftover sand is considered a byproduct that is left in the pits. As operations are complete in an area, the pits turn into "treatment ponds" for stormwater control.

4. RECORD REVIEW

Record Review	YES	NO	N/E
Part III.D.1.a – Has the Permittee collected at least one grab sample of the discharge to surface waters from each point source twice per month at a rate of at least every other week if a discharge occurs at any time during the two week period?		X	
Part III.D.1.b – If the permittee is discharging during a quarterly reporting period as a result of pumping (e.g., from incised pits or ponds, old highwall cuts, old pit areas or depressions), has the Permittee collected at least one discharge sample?		X	
Part III.D.2 – Are samples collected at the nearest accessible location after final treatment and just prior to discharge, or at an alternate location approved in writing by the Department?		X	
Part III.D.3 – Are sample collection and measurement actions conducted in such a way by the Permittee in order to ensure the sample or measurement is representative of the volume and nature of the monitored discharge?		X	
Part III.D.4 – Is the Permittee using one of the testing procedures outlined from the permit regarding minimum levels (MLs)?		X	
Part III.D.5 – Is the Permittee recording the following each measurement or sample taken? - The facility name and location, point source number as indicated in the NOI (if applicable), date, time, and exact place of sampling or measurements - The name of who obtained the samples or measurements - The dates and times the analyses were performed - The name of the person who performed the analyses - The analytical techniques or methods used including source of method and method number - The results of all required analyses		X	
Part III.D.6.b – Records of the written log for inspections of each point source identified in the Permittee's NOI and all treatment or control facilities or systems used by the Permittee to achieve compliance with the terms and conditions of the Permit. The written log includes: - The date and time the point source and any associated treatment or control facilities or systems were inspected - Whether there was a discharge from the point source at the time of inspection - If a sample of the discharge from the point source was collected at the time of inspection - If all associated treatment or control facilities or systems appeared to be in good working order and operating as efficiently as possible, and if not, a description of the problems or deficiencies - The name and signature of the person performing the inspection of the point source and associated treatment or control facilities or systems		X	
Part III.D.7 – Is the Permittee retaining all records for a period of at least three (3) years from the date of the inspection, sample measurement, or report?		X	

4. RECORD REVIEW			
Record Review	YES	NO	N/E
Part III.E.2 – Noncompliance Notification The completed form must document the following information: • A description of the discharge and cause of noncompliance • The period of noncompliance, including exact dates, times, and duration of the noncompliance. If not corrected by the due date of the written report, then the Permittee is to state the anticipated timeframe that is expected to transpire before the noncompliance is resolved • A description of the steps taken and/or being taken to reduce or eliminate the noncomplying discharge and to prevent its recurrence			X
Comments: The Facility representatives stated there was a piped outfall at Outfall 001E from February 2022 through July 2023; however, Facility representatives did not collect discharge samples from Outfall 001E to Big Escambia Creek during that period. Additionally, the Facility representatives stated they did not conduct inspections of the point source during this period and was not conducting inspections of any treatment or control facilities or systems used by the Permittee to achieve compliance with the terms and conditions of the Permit.			

5. SITE EVALUATION & PAP IMPLEMENTATION	
Pollutant Sources	Note location, quantitative description, design issue, O&M deficiencies (including the nature and extent), and pollutants off-site
Part IV.A.1 – Proper Operation and Maintenance	The earthen berm along the southern and eastern perimeters of the Facility was observed with rills and minor erosion. A low spot was observed in the southern berm adjacent to the Robinson Creek bridge crossing (refer to Appendix B, Photographs 2 and 3). The Facility representatives stated that the berm is constructed of overburden and topsoil material from the Facility and is roughly 15 feet high along Big Escambia Creek and added that no one (i.e., state engineers) approved the berm construction.
Part IV.A.2.a – ADEM Admin. Code ch. 335-6-9 Appendix A – Sedimentation Controls	The Facility contains a series of interconnected “treatment ponds” which contain mining process water, groundwater, and stormwater runoff. At the time of the inspection, the Facility was no longer discharging to surface waters through Outfall 001E (refer to Image 1, below). The Facility representatives explained that the ponds and entire Facility are set up as a “closed loop system” and all water within the site is contained by the treatment ponds. To prevent the level of the ponds from rising past the berm height, water is pumped between the ponds (refer to Appendix B, Photographs 4 through 6). Per the PAP, “... field examination of pit topography and consideration of site geology indicates that surface water discharge will not occur from the mining areas as presently configured (i.e. stormwater will discharge to groundwater) ... Under normal operations, no discharge is anticipated since infiltration is facilitated by the ‘incised pit’ configuration.” The Facility had created two known discharge locations from the active permitted area, and one discharge point from the previously permitted Sardine Pit South, which discharged process water to state waters. Discharges from these locations were not monitored or reported in the DMRs (refer to Appendix A, Exhibit 4). The first discharge point, Outfall 001E, was located in the southeast corner of the Facility, just north of the Robinson Creek confluence with Big Escambia Creek (refer to Appendix C, Figure 3). An ADEM June 2023 inspection report found the Facility was discharging water from the southeast treatment pond to Big Escambia Creek via a piped outfall (Outfall 001E; refer to refer to Appendix A, Exhibit 3). The Facility representatives stated the outfall pipe was installed in approximately February 2022 due to large rain events in the area that were overwhelming the Facility. Outfall 001E operated through July 2023 to prevent the berm from failing. The Facility representatives added that in July 2023 the Facility removed the outfall and repaired the berm to prevent discharges from the Facility. During the period of discharge, no discharge samples were collected from Outfall 001E. Additionally, the Discharge Monitoring Reports (DMRs) submitted from this period stated there was no discharge from Outfall 001E (refer to Appendix A, Exhibit

5. SITE EVALUATION & PAP IMPLEMENTATION

Pollutant Sources	Note location, quantitative description, design issue, O&M deficiencies (including the nature and extent), and pollutants off-site
	4). The discharge of process water from the treatment pond led to the south through a defined channel and directly to Big Escambia Creek (refer to Appendix C, Figure 3). The EPA Inspection Team viewed the remnant channel leading to Big Escambia Creek (refer to Appendix B, Photographs 23 through 23); they also documented the repaired berm. The second discharge location was located along the northern end of the Facility within the permitted area (refer to Appendix C, Figures 4 and 5). This area had been cleared of trees in preparation to be mined. The Facility representatives stated that the berm along Big Escambia Creek and active mining is planned to continue north into this area. During the inspection, the EPA Inspection Team noted an area where a deep channel had been excavated leading to Big Escambia Creek and flowing water was observed into Big Escambia Creek (refer to Appendix C, Figures 4 and 5; Appendix B, Photographs 8 through 11). The area above the channel was heavily disturbed and appeared to have been recently filled in based on loose unconsolidated material observed. The Facility Site Manager present stated that he was unsure why the channel was created and was unaware of any permit to excavate a channel to Big Escambia Creek. Aerial imagery from January 2023 depicts a channel that was created across the northern area of the Facility likely to drain the area. The channel leads to Big Escambia Creek (refer to Appendix C, Figure 4). It is unknown when the excavated channel was constructed and when the channel was filled in prior to the inspection. The EPA Inspection Team reviewed <i>Google Earth</i> aerial imagery of the Sardine Pit area before the inspection and observed evidence of surface water discharge from the previously permitted South Sardine Pit to Robinson Creek and ultimately to Big Escambia Creek (refer to Appendix C, Figure 6). The EPA Inspection Team inquired with Facility representatives about discharges from the previously permitted Facility (Sardine Pit South) to Robinson Creek. The Facility representatives stated that they were unaware of any discharges ever occurring and they have never intentionally discharged from the ponds to Robinson Creek. When the EPA Inspection Team provided the Facility representatives with the aerial imagery of the discharge the Facility representatives stated that the imagery was likely from around 2016. The Facility representatives explained that inflow to the pond previously occurred from an upstream location and there was likely a “natural cut” in this area where water left the active mining area. They added that that the inflow from the upstream source had been removed and they had re-built the berm to ensure no discharge from the reclamation area. The EPA Inspection Team viewed the area of the previous outfall channel and confirmed that the berm had been re-built in this area and no discharges were observed (refer to Appendix C, Figure 7; Appendix B, Photograph 22). It is unclear how long Sardine Pit South discharged process water to Robinson Creek.
Part IV.A.2.a – ADEM Admin. Code ch. 335-6-9 Appendix B – Haul Roads	The topographic map included in the PAP indicates there is one haul road running from the front gate towards the center of the Facility. All runoff from the road will enter one of the treatment ponds at the Facility.
Part IV.A.3.c – Minimization of contact with water	The southern and eastern portions of the Facility are enclosed in an earthen berm and runoff from overburden stockpiles is retained onsite and directed to one of the treatment ponds. In the northeast corner of the Facility, the EPA Inspection Team observed stockpiled fill within 50 feet of Big Escambia Creek. The stockpiles were not equipped with erosion or sediment controls to minimize contact with stormwater and the possibility of sediment laden, acidic, or toxic waters from such areas being discharged to Big Escambia Creek (refer to Appendix B, Photograph 7). In addition, the Facility had excavated a drainage channel adjacent to the stockpiled fill material leading directly to Big Escambia Creek (refer to Appendix B, Photographs 8 through 11). The fill material was observed in the excavated channel immediately adjacent to Big Escambia Creek.

5. SITE EVALUATION & PAP IMPLEMENTATION

Pollutant Sources	Note location, quantitative description, design issue, O&M deficiencies (including the nature and extent), and pollutants off-site
Part IV.A.3.d – SPCC	The SPCC plan provided during the inspection was not reflective of the current Facility conditions or practices. The following was identified: • The Facility’s SPCC plan states that the only ASTs at the Facility are one 7,500-gallon diesel AST and one 4,000 gallon mobile tanker used to fuel equipment. During the inspection, the Facility representatives stated that the following oil containers were present: ○ One 10,000-gallon diesel AST ○ One 3,000-gallon waste oil AST ○ One 4,000-gallon diesel AST ○ Two 275-gallon poly totes containing hydraulic oil During the Facility tour, the EPA Inspection Team observed the 10,000-gallon diesel AST, the 3,000-gallon waste oil tank, the 4,000-gallon AST, and the two 275-gallon poly totes. They additionally observed one diesel tank used for a barge’s generator and two additional fuel tanks in the washer plant area of the Facility. • The 3,000-gallon waste oil AST was observed without secondary containment and sitting directly on the pervious ground surface (refer to Appendix B, Photograph 11). • The two 275-gallon totes containing hydraulic oil did not have secondary containment (refer to Appendix B, Photograph 12). • The 4,000-gallon AST was observed to be no longer in service and did not have proper labeling (i.e., “out of service” or “permanently closed”) to indicate the status of the AST (refer to Appendix B, Photographs 13 and 14). • The concrete containment structure for the 10,000-gallon AST was observed filled with stormwater. When asked how the containment is drained after storm events, the Facility representative stated they use a bucket and pour the water on the ground (refer to Appendix B, Photograph 15).
Part IV.A.3.e – Accessibility to Facilities and Systems of Treatment and Control	The facilities and systems of treatment and control observed at the Facility were the treatment ponds in the southern portion and the constructed earthen berm along the southern and eastern perimeters. All controls were observed to be accessible by either foot or vehicle for inspections and maintenance.
Part IV.A.4 – Facility Identification	A sign was observed at the front gate entrance on the western perimeter of the Facility which included all of the required information. A second sign was observed along the southern perimeter at a bridge crossing for Robinson Creek (refer to Appendix B, Photographs 1 and 16).
Part IV.A.5 – Removed Substances	The PAP states, “Sediments basin (ponds) will be cleaned out when sediment accumulation is 60% of design capacity. Sediment removal shall be done as needed and as conditions warrant.” The Facility representatives did not state that the treatment ponds are maintained to remove accumulated sediment.
Comments: N/A	

6. OUTFALL, STORMWATER DISCHARGE & RECEIVING WATER OBSERVATIONS

Outfall, Stormwater Discharge & Receiving Water	YES	NO	
Number & location of stormwater discharge(s)/outfall(s) consistent with the PAP	X		Describe: The PAP states that there is one existing outfall (Outfall 001E) and three proposed outfalls (Outfalls 002P, 003P, 004P). At the time of the inspection, the Permittee had created a constructed conveyance from the site into Big Escambia Creek (refer to <u>Appendix B, Photograph 8 and 9</u>).
Evidence of off-site accumulation of pollutants observed in receiving water		X	Describe: The Inspection Team did not observe any evidence of off-site accumulation of pollutants observed in receiving waters. Fill material was observed in an excavated channel immediately adjacent to Big Escambia Creek.
Other discharges or potential discharges off-site (not through permitted outfalls)	X		Describe: In the northeast corner of the Facility, a drainage that had been dug was observed that allowed stormwater to leave the Facility and flow directly into Big Escambia Creek (refer to <u>Appendix B, Photograph 8 and 9</u>). The location was observed in an area with stockpiled materials without controls to minimize contact with stormwater (refer to <u>Appendix B, Photograph 7 and 10</u>). The stockpiles were located within 50 feet of Big Escambia Creek.
Non-stormwater discharge observed		X	Describe: Non-stormwater discharges were not observed.

7. POTENTIAL NON-COMPLIANCE ITEMS AND AREAS OF CONCERN

Additional inspection summary, narrative, findings, comments, photos, and schematic diagram of the facility area as necessary:

Exit interview conducted with:

Michael Campbell
Scott Campbell
Paul Bell

Preliminary findings discussed during the exit interview included:

- The DMRs submitted to ADEM from February 2022 through July 2023 were found to be neither true nor accurate. This was supported by the following:
 - The Facility representatives stated there was a piped outfall in the location of Outfall 001E from February 2022 through July 2023. The outfall did not have any control measures to manage or stop discharges from leaving the Facility (refer to Appendix A, Exhibit 3).
 - The Facility representatives stated that during that period, no personnel were monitoring Outfall 001E for discharges. The individual who completes the DMR does not conduct site visits to the Facility to inspect Outfall 001E for discharges. The individual reported no discharge on the DMRs during the February 2022 – July 2023 period without visually observing the outfall (refer to Appendix A, Exhibit 4).
 - The DMRs reported no discharge for Outfall 002P. Outfall 002P was stated by Facility representatives to have never been constructed and does not exist.
- According to the Facility representatives at the time of the inspection, the Facility was no longer discharging from any outfalls. However, neither the Facility representatives nor their designees had been conducting the twice monthly inspections of their treatment, control facilities, or systems used by the Permittee to achieve compliance with the Permit (i.e., their earthen berms).
- The Facility was not maintaining the 50-foot setback from streams with a buffer zone along the eastern and southern perimeters adjacent to the Big Escambia Creek and Robinson Creek per ADEM state code. The EPA Audit Team observed six (6) locations where there was less than 50 feet between the berm and the receiving waters (refer to Appendix B, Photographs 17 through 21).

- In the northeast corner of the Facility, a drainage channel had been excavated to allow discharges from the Facility into Big Escambia Creek (refer to Appendix B, Photographs 7 through 11; Appendix C, Figures 4 and 5).
- During the walkthrough of the Facility, the EPA Audit Team observed the following:
 - Two 275-gallon totes containing hydraulic oil, located on the east side of the office and maintenance building, were without secondary containment
 - One 3,000-gallon waste oil tank was observed in the fueling area without secondary containment and placed directly on the ground surface. The tank is not double walled
 - One diesel tank for the barge generator, located in the active mining area was not included in the Facility's SPCC aboveground storage tank (AST) inventory
 - Three ASTs that are no longer in use and are considered by the facility to be "permanently closed" did not have labels on the tanks indicating the permanently closed status of the ASTs.

Image 1

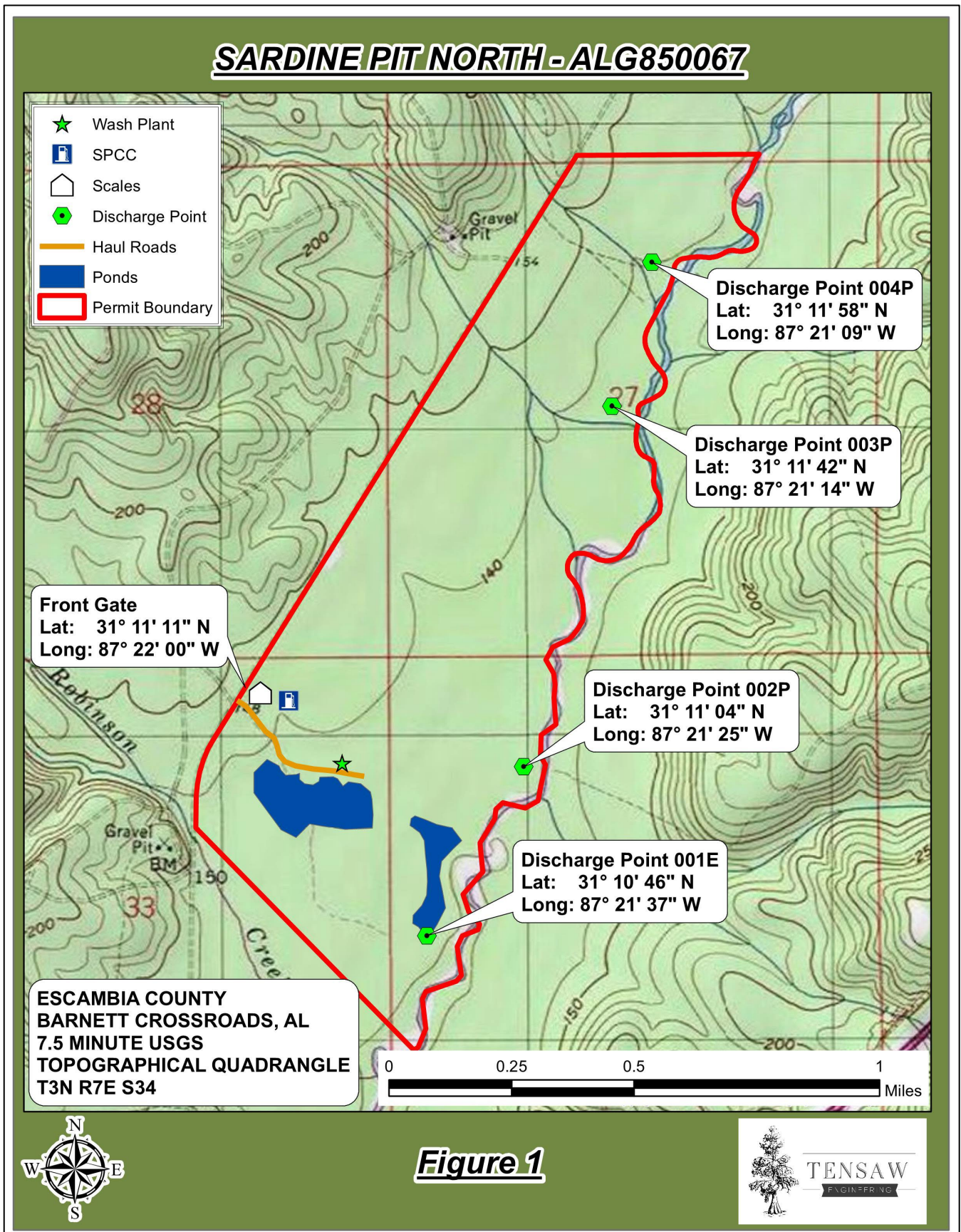
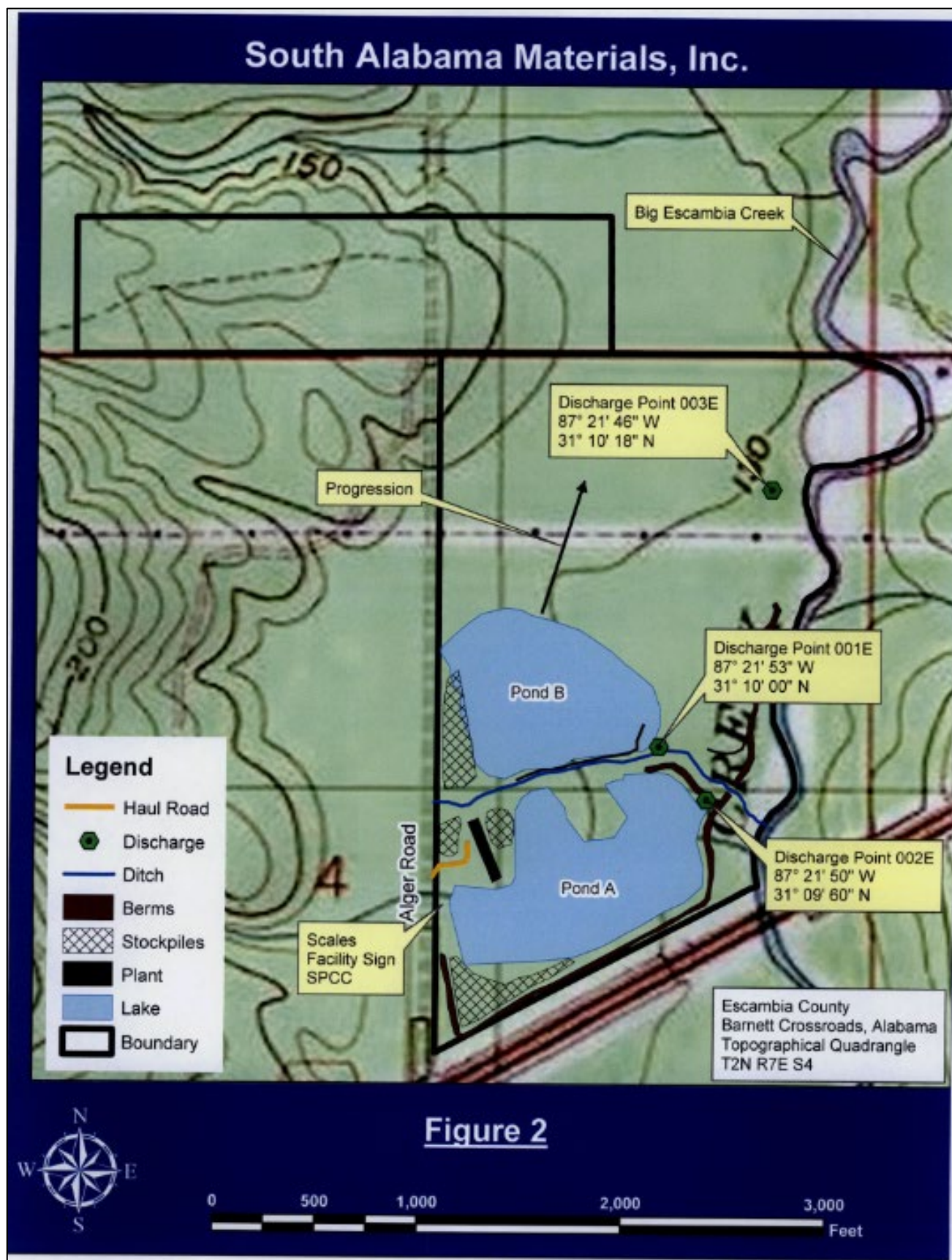


Image 2



Requested Records

1. A copy of the current (as of the date of the inspection) Pollution Abatement Plan (PAP) required under Part IV of the Permit. Include with the plan the date of the original PAP and the dates of plan updates/modifications.
2. A copy of the current (as of the date of the inspection) Spill Prevention, Control, and Countermeasures (SPCC) plan required by Part IV of the Permit.
3. The names, mailing addresses, and phone numbers for all persons responsible for the day to day implementation of the PAP at any time from January 2021 to the present.
4. Copies of the following in chronological order from January 2021 to the present:
 - a. Records and logs of twice per month sampling of discharges to surface waters.
 - b. Records and logs of once per quarter sampling of discharges from pumping.
 - c. Records of results for each measurement or sample taken with all required information per Part III.D.5 of the Permit.
 - d. Records and logs of twice per month routine inspections done by the permittee.
5. A copy of the site map or diagram per Part II.C.d of the Permit showing directions of flow, limits of disturbance, treatment basins, and discharge points, if not included within the site PAP.