



NPDES Compliance Inspection Report

Friday Exploration Project

Elk City, Idaho

NPDES Tracking Number:

#IDR050265

Inspection Date: 8/31/2023

Prepared by:

CJ Langlois

U.S. Environmental Protection Agency, Region 10

Enforcement & Compliance Assurance Division

Water Enforcement & Field Branch

Field, Data & Drinking Water Enforcement Section

Inspector Signature/Date:

Langlois, Curmit



Digitally signed by Langlois, Curmit
Date: 2024.01.31 04:40:09 -08'00'

Supervisor Signature/Date:

PETER CONTRERAS



Digitally signed by PETER CONTRERAS
Date: 2024.01.31 08:45:18 -08'00'

Contents

I.	Facility Information	3
II.	Inspection Information	3
III.	Permit Information	4
IV.	Enforcement Background.....	4
V.	Inspection Chronology	4
VI.	Opening Conference.....	5
VII.	Laboratory Inspection.....	6
VIII.	Site Review.....	6
VII.	File Review.....	7
IX.	Areas of Concern.	7
X.	Closing Conference.....	8

Attachment A – Aerial Image & Site Map

Attachment B – Photograph Log

[Unless otherwise noted, all details in this inspection report were obtained from conversations with Ms. Robin Hunt and James Lloyd, a review of facility documents, and/or from observations made during the inspection.]

I. Facility Information

Facility Name:	Friday Exploration Project
Facility Owner/Operator:	Endomines
Physical Address:	6 Quartz Creek Rd. Elk City, ID, 83525
Mailing Address:	P.O. Box 132 Elk City, ID, 83525
Lat/Long:	45.7037241° N, -115.5413193° W
Facility Contacts:	Robin Hunt, Site Administrator Friday Exploration Project Office: (208) 451-2521 Email: robin.hunt@endomines.com James Lloyd, Environmental Contractor (November, 2022 – Present) Lloyd Mining Services Cell (406) 465-7328 Email: lloydminingservices@gmail.com
Permit Number:	#IDR050265
SIC Code:	1041 (Gold Ore Mining)
Nearest Surface Water:	Crooked River

II. Inspection Information

Inspection Date:	August 31, 2023
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Inspectors: CJ Langlois
EPA Region 10, ECAD / WEFB / FDDWES
Phone: 206-553-2739

Arrival Time: 1:45 p.m.

Departure Time: 3:45 p.m.

Weather: Partly Cloudy, 63° F

Purpose: To evaluate compliance with the requirements of the Clean Water Act (CWA) and the National Pollutant Discharge Elimination System (NPDES) Multi-Sector General Permit, Sector G, for Stormwater Discharges Associated with Industrial Activity in Idaho.

III. Permit Information

The Friday Exploration Project is permitted under the EPA's MSGP (Multi-Sector General Permit), Sector G (Metal Mining – ore mining and dressing), and Subsector G2. The MSGP was issued on January 15, 2021. On July 1, 2021, the Idaho Department of Environmental Quality (DEQ) became the delegated authority for the permit. DEQ is now responsible for issuing permits and assuring compliance with the permits.

IV. Enforcement Background

The Friday Exploration Project has not had any enforcement actions in the past five years according to the Integrated Compliance Information System (ICIS).

V. Inspection Chronology

This was an unannounced inspection. On August 31, 2023, I arrived at the facility at 1:45 p.m. I met Ms. Hunt outside of the facility's office and stated the reason for my visit. We then walked into the facility's office where I explained the scope of my inspection. I presented my credentials to Ms. Hunt and provided my business card along with a Small Business Administration

(SBA) form to her. Ms. Hunt answered all my questions and I was not denied access to any area of the facility. The inspection at the site lasted until approximately 3:45 p.m.

VI. Opening Conference

I began the inspection with a brief opening conference in the facility's office and explained the scope of the inspection to Ms. Hunt. I handed over an SBA (Small Business Administration) form, a business card, and commenced a file review. Ms. Hunt is the Site Administrator and is in charge of the site inspections as required by the permit. Typical operating hours for the site are 5 a.m. – 3 p.m., Monday through Thursday. At the time of my inspection, there were four individuals employed at the site. In 2019, Endomines took over the operation. Endomines is the operator and owner of Friday Exploration Project and is based out of Finland.

The Friday Exploration Project is located deep into the mountains of Idaho and approximately 10 miles southwest of Elk City, Idaho. The site covers approximately 6.1 acres of land. The nearest body of water is Crooked River which is located approximately 250 feet away from the site within a valley. At the time of my inspection, only dewatering operations were being conducted to keep the mine from filling in with water. The last date of processing, mining, and drilling was back in February of 2022. It is now in a care and maintenance schedule. On an average day, 50,000 gallons of water are pumped out of the mine. This water is then pumped out to an LAD (land area dispersement) system. This system is comprised of pumps, pipes, and hoses that attempts to evenly spread out the wastewater onto the slopes of the mountain on which the Friday Exploration Project is located to allow for an infiltration application. In September of 2022, the area was affected by the Williams Creek Fire which burned many trees in the area along with part of the LAD system which has since been repaired.

The main order of business at the site is to mine gold ore. Primary activities at the site consist of drilling, mining, and exploring gold ore. Red dye diesel, regular diesel, gasoline, lubricants, explosives, drilling fluids, and antifreeze are stored and used on-site. They have some potential to be exposed to stormwater. Vehicle maintenance is also conducted on-site but is done so in a designated shed.

VII. Laboratory Inspection

Friday Exploration Project utilizes Energy Labs located in Helena, Montana. Samples are kept preserved with ice in a cooler and are transported by James Lloyd. The laboratory analyzes for arsenic, cadmium, copper, iron, lead, manganese, mercury, zinc, and for TSS (total suspended solids). Parameters analyzed in-house include pH, temperature, SC, ORP, and DO. Grab samples are collected from both outfalls 001 & 002. In June of 2019 and 2021, no monitoring data was submitted for any parameter (a total of 68 non-receipt violations in ICIS). It is unclear the reasoning behind this because a different environmental contractor was employed by Endomines at that time and that information was not passed down.

VIII. Site Review

Ms. Hunt took me on a tour of the facility. A site map and aerial image appear in **Attachment A** and a photograph log appears in **Attachment B**.

The Friday Exploration Project is located on a mountain with moderate to heavy vehicle traffic. During the time of inspection, very limited traffic was observed due to its current “care and maintenance” schedule. There are several areas within the site that fall under the regulation of the permit and are mentioned throughout the SWPPP (Stormwater Pollution Prevention Plan). These areas include vehicle and equipment fueling areas, access roads, stockpiles of ore, LAD application areas and storages of various petroleum-based products (**Photo 1**). I observed petroleum storage areas with secondary containment. Nitrates are also stored on-site in an explosives storage area. During times of dry weather, water is sprayed on disturbed areas, as appropriate, to mitigate dust.

The two designated outfalls for the site do not seem to be from a point source, but rather from runoff down the sides of the mountain on which the site is located. This runoff ultimately makes its way to the Crooked River but during the time of the inspection, no stormwater runoff was observed due to the dry conditions. The first designated outfall is 001 – Quartz Creek (**Photo 2**). Quartz Creek joins the Crooked River at a confluence approximately 200 feet

from the site. The second designated outfall is 002 – Crooked River. During the inspection, Ms. Hunt and myself drove down to the Crooked River where she believed the majority of the runoff was occurring. The river was fairly turbid during the time of the inspection but there was no clear evidence that this was directly related to the Friday Exploration Project. This also could be attributed to the wildfire that ravaged the area (**Photos 3 & 4**) in 2022. I observed sediment fences, berms, ditches, and straw bales in place to help mitigate erosion of area sediments. Towards the bottom of the site, I did observe sediment fence that was damaged (**Photo 5**) and that would be ineffective during a rain event.

IX. File Review

I reviewed the following records:

- Routine Inspection Reports – 2022.
- Quarterly Visual Assessments - 2022
- Stormwater Pollution Prevention Plan (SWPPP) – December 2019
- Analytical Lab Report - August 2023
- Sampling Field Notes – July 2023

X. Areas of Concern

1) Electronic Reporting Requirement

Section 7.2 of the permit states that “You must submit all NOIs, NOTs, NECs, Annual Reports, Discharge Monitoring Reports (DMRs), and other reporting information as appropriate electronically, unless the EPA Regional Office grants you a waiver based on one of the following conditions:

- If your headquarters is physically located in a geographic area (i.e., zip code or census tract) that is identified as under-served for broadband Internet access in the most recent report from the Federal Communications Commission; or
- If you have limitations regarding available computer access or computer capability. Waivers are only granted for a one-time use for a single

information submittal, e.g., an initial waiver for an NOI does not apply for the entire term of the permit for other forms. If you need to submit information on paper after your first waiver, you must apply for a new waiver. The EPA Regional Office may extend a waiver on a case-by-case basis. If you wish to obtain a waiver from submitting a report electronically, you must submit a request to the applicable EPA Regional Office, found in Part 7.8. In that request you must document which exemption you meet, provide evidence supporting any claims, and a copy of your completed paper form. A waiver may only be considered granted once you receive written confirmation from EPA or its authorized representative.”

In June of 2019 and 2021, no monitoring data was submitted for any parameter (a total of 68 non-receipt violations in ICIS). Section 7.2 of the permit requires that all DMRs be submitted. Section 7.3.4 requires that all monitoring data be submitted “no later than 30 days after receiving your complete laboratory results for all monitored discharge points for each monitoring period....”

2) Annual Report

Section 7.4 of the permit states that “You must submit an Annual Report to EPA via NeT-MSGP, per Part 7.2, by January 30th for each year of permit coverage containing information generated from the past calendar year....”

The Annual Reports for 2022 and 2023 were not submitted on time. The Annual Reports must be submitted by January 30th, for the previous year, as stated in the permit.

2) Closing Conference

A closing conference was held with Ms. Hunt on the afternoon of August 31, 2023. I stated that no obvious areas of concern were identified over the course of the inspection and gave a brief overview of the post-inspection process. I thanked her for her time and assistance.

Attachment A

Site Map & Aerial Image



Figure 1 - Aerial image taken from Google Maps

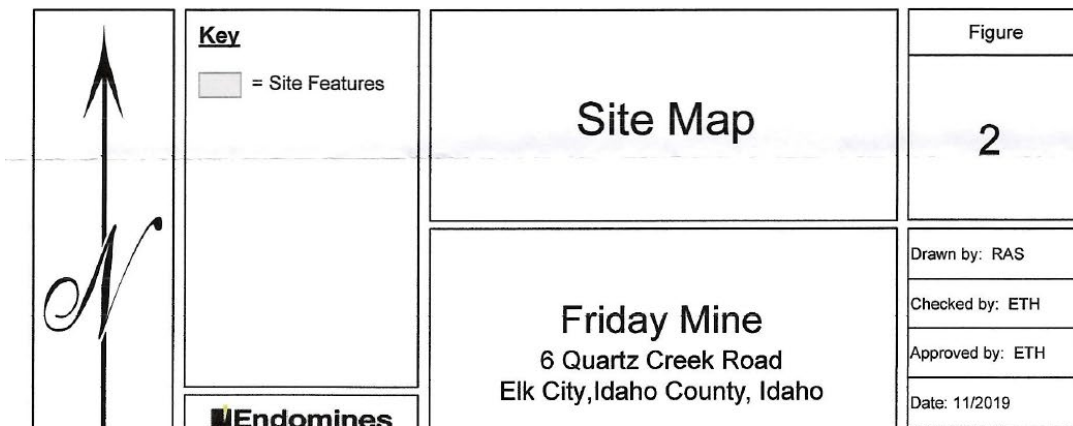
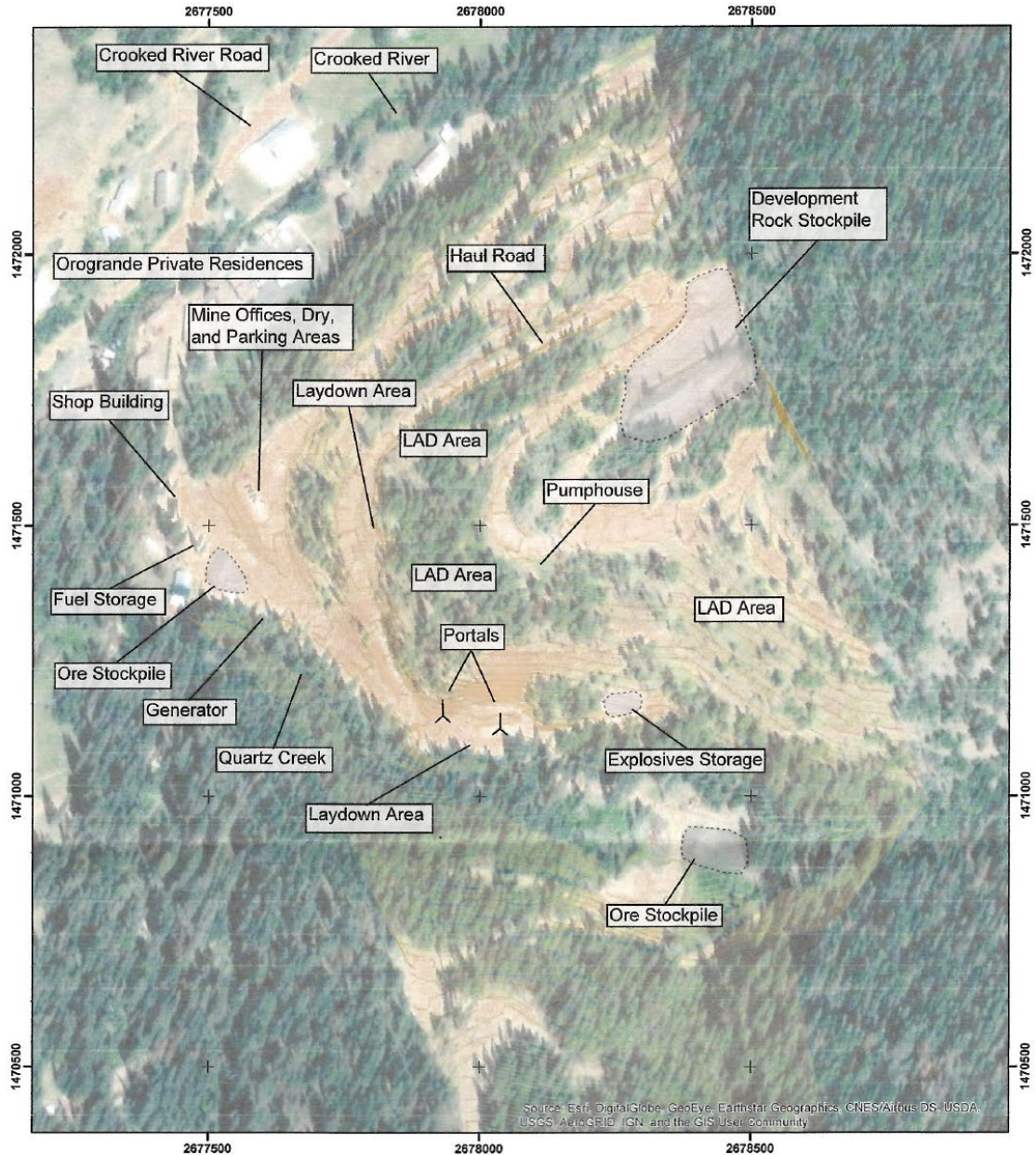


Figure 2 - Site map provided by Friday Exploration Project

Attachment B

Photo Log

(Photographs were taken by CJ Langlois on August 31, 2023, with an Olympus Touch TG-6.)



Photo 1 - Fuel storage and secondary containment



Photo 2 - Quart Creek - Outfall 001



Photo 3 - Wildfire damage



Photo 4 - Wildfire damage



Photo 5 - Damaged and down sediment fence