# NPDES Inspection Report

| National Database Information | |
|---|---|
| Inspection Date: 9/18/2024 | Inspection Type: Industrial Discharger |
| Entry/Exit Time: 9:00 a.m. – 11:05 a.m. | NPDES ID Number: UT0000184 |
| NAICS Code: 212399 | Inspection ID: 202409_ UT0000184 |
| Lead inspector and affiliation: Jennifer Ferrando, U.S. Environmental Protection Agency (EPA) Region 8 | |
| Inspector and affiliation: Akash Johnson, EPA Region 8 | |
| Inspector and affiliation: Althea Wilson, EPA Region 8 | |

| Facility Location Information | |
|---|---|
| Site/Facility Name & Location:<br>Table Rock Minerals #1 Mine<br>Uintah County, Utah | Mail Report to:<br>John Smith, General Manager<br>Jim Lekas, Consultant<br>Table Rock Minerals |

| Inspection/Site Contacts | |
|---|---|
| | Name, Title, Affiliation |
| Facility Contacts: | John Smith, General Manager, Table Rock Minerals (present) |
| | Jim Lekas, Consultant, Table Rock Minerals (present) |
| Tribal Government Contacts: | Bart Powaukee, Water Quality Coordinator, Ute Tribe (not present) |

| Permit Information | |
|---|---|
| Is the permit on site and available? N/A – permit not yet issued at the time of the inspection | Date Permit Application Submitted: 7/10/2023 |
| Effective Date: 12/1/2024 | Expiration Date: 9/30/2029 |
| Latitude: 39.9189° N (Outfall 001) | Longitude: 109.5778° W (Outfall 001) |
| Receiving Water(s): unnamed tributaries of Cottonwood Wash, which is a tributary to the White River | |
| Regulatory Inspector's source of information: EPA records , NPDES Permit and Statement of Basis, inspection observations, and the facility's representatives. | |

| Areas Evaluated During Inspection | | |
|---|---|---|
| Permit | Self-Monitoring Program | Pretreatment |
| Records/Reports | Compliance Schedule | **Pollution Prevention** |
| **Facility Site Review** | Laboratory | **Storm Water** |
| **Effluent/Receiving Waters** | **Operations and Maintenance** | Combined Sewer Overflow |
| Flow Measurement | Sludge Handling/Disposal | Sanitary Sewer Overflow |

| Report Review and Signature | | |
|---|---|---|
| Lead Inspector and Report Writer Name/Signature/Final Date | | Contact Information |
| JENNIFER FERRANDO Digitally signed by JENNIFER FERRANDO Date: 2025.01.30 11:12:43 -07'00' | | **U.S. EPA Region 8<br>Denver, Colorado<br>ferrando.jennifer@epa.gov<br>(303) 312-6601** |
| Reviewer Name | Review Date | Contact Information |
| **Althea Wilson** | **1/27/2025** | **U.S. EPA Region 8<br>Denver, Colorado<br>wilson.althea@epa.gov<br>(303) 312-6026** |
| Reviewer Name | Review Date | Contact Information |
| **Akash Johnson** | **1/27/2025** | **U.S. EPA Region 8<br>Denver, Colorado<br>johnson.akash@epa.gov<br>(303) 312-6067** |
| Management Reviewer Name/Signature/Date | | Contact Information |
| EMILIO LLAMOZAS Digitally signed by EMILIO LLAMOZAS Date: 2025.01.30 08:53:39 -07'00' | | **U.S. EPA Region 8<br>Denver, Colorado<br>llamozas.emilio@epa.gov<br>(303) 312-6407** |
| **Emilio Llamozas, NPDES and Wetlands Enforcement Section Supervisor** | | |

## Inspection Narrative and Site Description

On Wednesday, September 18, 2024, U.S. Environmental Protection Agency (EPA) National Pollutant Discharge Elimination System (NPDES) inspectors Akash Johnson, Jennifer Ferrando, and Althea Wilson (inspectors) conducted a compliance evaluation inspection of the Table Rock Minerals #1 Mine (Facility), located in Uintah County, Utah, within the exterior boundaries of the Uintah and Ouray (Reservation). The Facility was operated by Table Rock Minerals, LLC. Ownership of the Facility and underlying lands was not evaluated during the inspection.

The purposes of the inspection were to evaluate compliance with the Clean Water Act requirements and evaluate Facility operations in the context of the Facility's then-draft NPDES permit for the discharge of mine dewatering wastewater (NPDES ID UT0000184) (permit). The EPA is the NPDES permitting authority for Indian country within EPA Region 8. At the time of the inspection, Table Rock Minerals, LLC had applied for NPDES permit coverage for the Facility, but no NPDES permit had yet been issued. The permit was subsequently issued to Table Rock Minerals on October 21, 2024, and became effective on December 1, 2024.

A letter notifying the Ute Tribe of the EPA's inspection presence on the Reservation was sent on August 19, 2024. On September 9, 2024, the EPA contacted Table Rock Minerals representative Jim Lekas to announce the EPA's intent to inspect the Facility and to coordinate logistics. Throughout the inspection, the inspectors took notes on discussions and observations in field logbooks. Photographs taken during the inspection are included in the enclosed photo log.

The Facility is a uintaite mining operation. Uintaite (also known as Gilsonite®) is a naturally occurring solid hydrocarbon material. Active uintaite mining sites consist of a vertical shaft sunk into the vein, with uintaite removed from the vein by mining horizontally in opposite directions from the shaft. Uintaite is chipped from the vein on a sloping face using a pneumatic hammer. Ore falls to the bottom of the slope and is vacuumed to a head frame at the surface where it is discharged to a silo. A baghouse at the surface filters the air that is used to transport the ore; filtered air is released to the atmosphere. Wastewater is generated from dewatering the mine. According to the Facility representatives, Table Rock Minerals dewaters the mine below the level of active mining so that the ore will be dry when it is extracted, eliminating the need to spread uintaite on the ground surface for drying.

Two mine shafts were present at the Facility at the time of the inspection, shaft 001 and shaft 002. Table Rock Minerals began shaft 001 operations in 2017-2018 and began dewatering at mine shaft 001 in early 2024. As of September 2024, mine shaft 001 was complete and mine shaft 002 was partially sunk. The permit authorizes discharges from two outfall locations, Outfall 001 and Outfall 002, associated with shaft 001 and shaft 002, respectively. At the time of the inspection, neither outfall was constructed and dewatering was only occurring at shaft 001. The facility representatives anticipated additional mine shafts would be needed over the 10 to 15 years that it would take to complete the mine.

On September 18, 2024, at approximately 9:00 a.m., the inspectors met with Jim Lekas, Consultant for Table Rock Minerals, and John Smith, General Manager for Table Rock Minerals, at the mine shaft 002 site located in Uintah County, Utah, to commence inspections of the Table Rock Minerals #1 Mine.

The inspectors presented their inspector credentials and proceeded to have an opening conference to explain the purpose of the inspection, discuss the schedule for the inspection, and discuss questions pertaining to the operation of the mine. The inspectors also explained that an inspection report would be generated and provided to John Smith and Jim Lekas with any findings identified during the inspections. Since no NPDES permit had been issued to the facility at the time of the inspection, the facility was not maintaining the records and documentation that would eventually be required by the permit, which was subsequently issued and became effective on December 1, 2024.

As previously discussed, the facility had not constructed effluent outfalls at either of the mine shaft sites and was not discharging wastewater at the time of the inspection. Pending issuance of the permit, the facility was collecting all wastewater pumped from shaft 001 in tanks at the site (Photos 39 and 40) and periodically hauling wastewater offsite for disposal. According to Facility representatives, approximately two tank trucks of wastewater were removed from the site every other week. Each tank truck has a capacity of 175 barrels for a total of approximately 350 barrels, or 14,700 gallons, of wastewater being hauled off site every two weeks. No manifests or other records relating to offsite disposal of wastewater were evaluated during the inspection.

The Facility representatives described how they expected to treat and monitor wastewater discharges at each outfall, anticipating that the effluent outfalls would be constructed in the spring of 2025. The treatment process and equipment selected would depend on the final limits in the permit, but the Facility representatives anticipated treatment would include acid injection for pH adjustment and an inline filter to remove solids. The filter system would consist of three filter socks, approximately 36 inches each, at each outfall. The facility representatives stated they would monitor the water pressure at the outfall to determine when the filters needed to be changed, as indicated by a drop in water pressure. Spent filter socks would be dried, the uintaite recovered, and the socks reused if possible. Filter socks would be disposed of at the end of their useful life. The facility representatives indicated they were in conversations with EPA's NPDES permit writer about using a totalizing flow meter to monitor flow at each outfall twice weekly. The hoist man at each mine shaft site would be responsible for conducting

and documenting any self-inspections required by the permit and John Smith or delegated administrative staff would be responsible for submitting all required reports.

After the opening conference, the inspectors viewed the mine shaft 002 pad. The mine shaft 002 site consisted of the mine shaft headframe and storage silos (Photo 34), an enclosed shed (hoist house) containing electrical equipment with an adjacent diesel generator (Photo 38), and an enclosed multipurpose building used for equipment storage, employee breaks, etc. The facility had begun sinking the mine shaft, but the shaft was not yet complete, and the vein was not being actively mined at the mine shaft 002 site. In addition, the effluent outfall had not yet been constructed (Photos 36 and 37). Removed overburden (rock) commingled with residual uintaite ore was piled on the ground next to the shaft (Photo 35). The pad site included a perimeter berm to control stormwater runoff.

The Inspectors then proceeded to inspect the active mine site (mine shaft 001) with the Facility Representatives. The mine shaft 001 site consisted of the mine shaft head frame with baghouses and silos (Photos 39, 43, and 44), an enclosed building (hoist house) containing electrical equipment with an associated diesel generator (Photo 45), and an enclosed multipurpose building used for equipment storage, employee breaks, etc. Removed overburden was piled on the surface next to the mine shaft (Photo 44) and near the planned outfall location (Photo 42), with residual uintaite ore present in the rock. In addition, small particles of uintaite were observed on the ground surface around the concrete pad below the silos (Photo 43). The facility representatives stated that the residual uintaite on the ground resulted from overfilling a truck. The effluent outfall had not yet been constructed (Photo 41). Two tanks were present at the mine shaft 001 pad site (Photos 39 and 40) to store wastewater for hauling offsite. The inspectors did not observe any evidence of dewatering wastewater discharges from the site.

The inspectors and Facility representatives then returned to the mine shaft 002 site for a closing conference. The inspectors discussed the inspection observations and next steps, including estimated timing for delivery of the inspection report.

Upon issuance of the facility's NPDES permit, which occurred between the inspection and issuance of this report, the inspectors reviewed the permit requirements relative to the inspection observations. This inspection and subsequent review of the permit requirements did not result in any findings pertaining to potential compliance concerns or deficiencies at the facility.

EPA's Region 8 Clean Water Branch staff have been in contact with the Permittee to discuss Clean Water Act requirements relative to industrial storm water discharges. EPA reminds the Permittee of the requirement in Section 6 of the NPDES permit to evaluate the need for separate permit coverage for stormwater runoff from the facility. Section 6 requires the Permittee, within 90 days from the date of permit issuance, to 1) submit a notice of intent (NOI) for coverage under EPA's Multi-Sector General Permit (MSGP) for discharge of stormwater associated with industrial activities, 2) submit a "no exposure" certification, or 3) document the Permittee's decision not to submit an NOI for coverage under the MSGP or a no exposure certification.