

- Significant amounts of material on the ground through Highland site. Some running off into ditch.
- Waste/Wastewater Management
 - The borrow pit treatment system at the toe of the Trail Ridge treatment ponds appears not to be included in regular inspections, is not readily accessible, and has places along the railroad tracks where water can potentially flow out of the permit boundary, possibly bypassing the NPDES outfall (Trail Ridge).
 - Brushy vegetation on dams of Trail Ridge treatment pond system does not allow visual inspection of dams that are actively used as part of the process water treatment system; large trees growing on dam walls could potentially affect dam integrity; water in borrow pits abuts the toe of the dam; some areas in the pond system may not have sufficient freeboard (Trail Ridge).
 - There are three active treatment ponds (11, 12, and 13), 9 inactive ponds from earlier processing periods. These inactive ponds, according to facility's permit, include roughly 654 reclaimed acres. Pond 8 appeared to be actively discharging but is not a permitted NPDES outfall; mine personnel stated that Ponds 1-9 are no longer receiving process water and have been reclaimed, however, no as-built drawings or request to transfer to operational phase have been received from these ponds (Highland).
 - North Maxville D001 was reported as not discharging in 2017 but was discharging during inspection due to rotten wooden stop gates.
- Pollutant Sources
 - Long term ponds may not have sufficient freeboard (Maxville).
 - Alum, barium chloride and lime vessels at Maxville are not in, or only partially surrounded by, secondary containment
 - Lime buildup on secondary containment at Maxville
 - Piles of road filling sediment were not within secondary containment at Maxville

Rule/Permit Reference: Permit Condition IX

Corrective Action: Evaluate the entire wastewater treatment systems at all sites for leaks, seepages, berm erosions and submit corrective action report on the findings. Submit as-built drawings or request to transfer to operational phase for inactive, reclaimed ponds.

Observation: *General* – The facility grounds were secured properly.

Observation: *General* – Safety equipment was available on the sites.

Observation: *General* – Inspection of the open ditch conveyance system from north of SR16 to the water treatment area is being conducted as required by permit condition V(3).

Observation: *General* – Foul odors did not permeate beyond the boundaries of the plant site at the time of the inspection.

Observation: *General* – No sinkholes were observed during site inspection.

7. **Flow Measurement:** Out-of-Compliance

Flow meter present and location as per permit?	Yes
Easy access to flow meter?	Yes

Deficiency: Staff gauge at D-001 (Trail Ridge) was broken.