

4. Sampling: Out-of-Compliance

Sampling conducted during inspection?	No
Sampling observed during inspection?	No
Sampling conducted at locations identified by the permit?	Yes
Safe access to sampling locations?	Yes

Deficiency: Chain of Custody documents were available and reviewed. Based on the review Radium and Hardness samples were not being properly preserved with HN03.

Rule/Permit Reference: Permit Condition IX

Corrective Action: Review preservation requirements for collecting samples and ensure DEP Laboratory SOP is followed for proper sample collection.

Observation: The composite samplers appear to be in satisfactory operating condition.

Observation: pH Buffers 4, 7 and 10 were within the expiration dates.

Observation: The collected samples hold times were not exceeded.

5. Records and Reports: Out-of-Compliance

Documents/Records reviewed	Timeframe
Discharge Monitoring Reports (DMRs)	03/01/2016 to 08/31/2017

Deficiency: Common findings observed during inspection of mining facilities:

- o No sludge management plan developed for humate (Maxville and North Maxville).
- o Site plan does not identify/provide maintenance and inspection procedures for BMP other than ponds.
- o Site plan has not been updated since it was implemented 2013.
- o Site plan does not provide details on evaluating accumulated water in secondary containment structures prior to discharging.
- o Total Radium 226/Radium 228 at outfall D002 was not reported the 1st Qtr 2017 as required by permit (Maxville).
- o Toxicity results were not provided at outfall D002 for 3rd Qtr (Maxville).
- o The lime treatment ponds associated with the long-term ponds and caustic pond are not included on the daily shift check sheet at Maxville.
- o No written documentation of which outfalls at North Maxville are constructed, inactive or active.
- o Inspection frequency of inactive ponds at North Maxville does not appear to be adequate.
- o Twin Pines area needs to be added to IW permit – to include monitoring & inspecting requirements.

The Plan should also include:

- o Details of the erosion and sediment control measures and/or structural measures (aside from settling ponds) used for the management of wastewater and stormwater runoff.
- o Identification and location of collection ditches, berms, and silt fencing.