- 6. Total Radium 226/Radium 228 at outfall D002 was not reported during the first quarter of 2017, as required by permit (Maxville).
- 7. Toxicity results were not provided at outfall D002 for third quarter (Maxville).
- 8. The lime treatment ponds associated with the long-term ponds and caustic pond are not included on the daily shift check sheet (Maxville).
- 9. No written documentation of which outfalls are constructed, inactive or active (North Maxville).
- 10. Inadequate inspection frequency of inactive ponds (North Maxville).
- 11. A permit modification to include Twin Pines in the Industrial Wastewater permit was not obtained prior to beginning operation.
- 12. Toxicity violations noted.
- B. The following were observed during the inspections of the industrial wastewater facilities associated with mining or formerly mined areas:
  - 1. Lime spillage at storage silos (Trailridge and Highland).
  - 2. No documentation that all areas are draining toward the treatment system, including the wash water from the vehicle washing area, and stormwater from the equipment staging and chemical storage area.
  - 3. Secondary containment structures are pumped to the ground instead of to the treatment system.
  - 4. Collection ditches, silt fencing, borrow pits, and berms throughout the mines did not appear to be incorporated into the company's routine inspections.
  - 5. Twin Pines silt fences were overwhelmed with sand; process water and tailings fill deposited in a wetland without permit authorization. Area not being monitored or inspected.
  - 6. Some eroded berms observed (North Maxville).
  - 7. Significant amounts of material on the ground with some running off into the ditch (Highland).
  - 8. 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 has the potential to flow out of the permit boundary, possibly bypassing the NPDES outfall (Trail Ridge).