



Katie Hobbs
Governor

ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY



Karen Peters
Cabinet Executive Officer

Case ID #: 221054

June 21, 2024

Gold Paradise Peak Inc.
Attention: Songqiang Chen
1660 S Amphlett Blvd
Ste 104
San Mateo, CA 94402

Subject: 570 Adit Waste/Tailings Senator Highway, Place ID 185727
LAT: 34d, 25', 39.7308" N LNG: 112d, 25', 47.046" W

NOTICE OF VIOLATION

This Notice of Violation (NOV) is an informal compliance assurance tool used by the Arizona Department of Environmental Quality (ADEQ) to put a responsible party (such as a facility owner or operator) on notice that the Department alleges a significant violation of an environmental requirement has occurred and this notice describes the facts known to ADEQ at the time of issuance. ADEQ has reason to believe that Gold Paradise Peak Inc. as the owner/operator of 570 Adit Waste/Tailings Senator Highway has violated a requirement of the Arizona Revised Statutes (A.R.S.), a rule within the Arizona Administrative Code (A.A.C.), or an applicable permit, license, or administrative order. ADEQ identified the violations alleged below during an inspection or file review completed on May 29, 2024.

ADEQ reserves the right to take a formal enforcement action, such as issuing an administrative order or filing a civil lawsuit, regardless of whether the Department has issued an NOV. Neither ADEQ's issuance of an NOV nor its failure to do so precludes the Department from pursuing these remedies. However, the timeliness of a complete response to this notice will be considered by ADEQ in determining if and how to pursue such remedies.

If this NOV is a result of an inspection then the NOV also serves as a monthly status update as required by A.R.S. § 41-1009(J).

I. LEGAL AUTHORITY and NATURE OF ALLEGED SIGNIFICANT VIOLATION(S)

1. **AZPDES Permit Standard Condition 5. Duty to Mitigate**

Failure of the Permittee to take all reasonable steps to minimize or prevent any discharge or sludge use or disposal in violation of this permit which has the reasonable likelihood of adversely affecting human health or the environment.

In December 2023, Gold Paradise Peak, Inc. installed a concrete block in the Senator Mine Adit, in an attempt to plug it, and covered the adit with earthen material. On May 29, 2024, during an onsite inspection, the inspector observed drainage daylighting on the surface of the earthen material covering the adit. The inspector observed this drainage bypassing the wetlands treatment system then comingling with the discharge from the spillway of the wetlands treatment system before discharging to the Hassayampa River at Outfall 001.

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It was observed that the first wetland treatment cell was filled with earthen material, which reduces the total volume/capacity of the treatment system, disrupts the inflow of discharge into the treatment system, and can directly cause and/or contribute to noncompliance events, such as bypasses. A drainage flow was observed on the south side of the second wetland treatment cell. This flow bypassed the entire wetlands treatment system along the south and converged with the discharge from the spillway of the wetlands treatment system, before discharging to the Hassayampa River at Outfall 001.

This is a recurring alleged violation from a Notice of Violation issued on December 26, 2023 (Case ID# 217184) and a Notice of Violation issued on May 10, 2024 (Case ID# 219925).

2. **AZPDES Permit Standard Condition 6. Proper Operation and Maintenance**

Failure of the Permittee to operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the Permittee to achieve compliance with the conditions of the permit.

On May 29, 2024, during an onsite inspection, the following was observed:

- The first wetland treatment cell had been filled with earthen material;
- The second treatment cell contained rocks and earthen debris;
- The treatment cells were not vegetated per design; and,
- The flow path to Outfall 001 appeared eroded/scoured.

Gold Paradise Peak, Inc. (GPPI) failed to operate and maintain the constructed wetlands treatment system, which is a recurring alleged violation from a Notice of Violation (Case ID# 217184) issued on December 26, 2023 and a Notice of Violation issued on May 10, 2024 (Case ID# 219925).

II. LEGAL AUTHORITY and NATURE OF OTHER ALLEGED VIOLATION(S)

1. **AZPDES Permit Standard Condition 13.f. Reporting**

Failure to report any non-compliance which may endanger human health or the environment as required by the permit.

At the time of this notice, Gold Paradise Peak, Inc. (GPPI) has not submitted written notification to ADEQ of the noncompliance event that was originally observed during an inspection on April 24, 2024, and observed again during an inspection on May 29, 2024.

III. OFFER TO MEET

ADEQ is willing to meet regarding this Notice and can provide information on how to return to compliance. To obtain additional information about this Notice or to schedule a meeting to discuss this Notice, please contact Steven Saeed at (520) 628-6743.

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Leigh Padgitt, Manager
SWP Inspections & Compliance Enforcement
Unit

DocuSigned by:



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Steven Saeed
SWP Inspections & Compliance
Enforcement Unit