



Douglas A. Ducey
Governor

ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY



Misael Cabrera
Director

CERTIFIED MAIL
Return Receipt Requested

April 10, 2019

Arizona Minerals, Inc.
Attention: Johnny Pappas
2210 E Fort Lowell Rd
Tucson, AZ 85719

Case ID #: 181810

Re: Notice of Violation issued to Arizona Minerals, Inc. -Trench Camp, Norton & January Mine Adits

Dear Mr. Pappas:

This letter constitutes the monthly update on the status of Arizona Department of Environmental Quality ("ADEQ") action resulting from ADEQ's inspection of the above-referenced site on March 12, as required by A.R.S. § 41-1009(J).

The attached Notice of Violation ("NOV") is an informal compliance assurance tool used by ADEQ to put a responsible party (such as a facility owner or operator) on notice that the Department believes a violation of an environmental requirement has occurred. It describes the facts known to ADEQ at the time of issuance and cites the requirement that ADEQ believes the party has violated.

Although ADEQ has the authority to issue appealable administrative orders compelling compliance, an NOV has no such force or effect. Rather, an NOV provides the responsible party an opportunity to do any of the following before ADEQ takes formal enforcement action: (1) meet with ADEQ and discuss the facts surrounding the violation, (2) demonstrate to ADEQ that no violation has occurred, or (3) document that the violation has been corrected.

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.

Sincerely,

Leigh Padgett, Manager
SWP Inspections & Compliance Enforcement Unit

Enclosure: ADEQ Notice of Violation Case ID# 181810



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Case ID #: 181810

April 10, 2019

Arizona Minerals, Inc.
Attention: Johnny Pappas
2210 E Fort Lowell Rd
Tucson, AZ 85719

Subject: Trench Camp, Norton & January Mines Adit, Place ID 154197
LAT: 31d, 28', 19" N LNG: 110d, 45', 49" W

NOTICE OF VIOLATION

The Arizona Department of Environmental Quality (ADEQ) has reason to believe that Arizona Minerals, Inc. as the owner/operator of Trench Camp, Norton & January Mines Adit 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, administrative order or civil judgment. ADEQ discovered the violations alleged below during an inspection completed on March 12, 2019.

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

1. **A.A.C. R18-11-108(A)(8)**

Violation of the narrative water quality standard that requires a surface water to be free from pollutants in amounts or combinations that change the color of the surface water from natural background levels of color.

On March 12, 2019, inspectors from the Arizona Department of Environmental Quality observed brown, turbid stormwater discharging from facility outfalls to the impaired waters of Alum Gulch and Harshaw Creek. ADEQ inspectors noted inadequate and insufficient control measures to manage on-site erosion, sediment and stormwater runoff.

2. **Permit 69932 (AZMSG-88923) - Multi-Sector General Permit AZMSGP2010-003; Section 2.1.1.5**

Failure to minimize on-site erosion and sedimentation.

On March 12, 2019, inspectors from the Arizona Department of Environmental Quality observed inadequate control measures to manage on-site erosion, sediment and stormwater runoff.

At Outfall 1, Several straw wattles were observed in disrepair and/or installed incorrectly. A silt fence was improperly installed across Alum Gulch. Turbid stormwater was discharging to Alum Gulch at time of inspection. Alum Gulch has been impaired since 1996 for cadmium, copper, zinc and pH.

Main Office

1110 W Washington Street ● Phoenix, AZ 85007
(602) 771-2300

Southern Regional Office

400 W Congress Street ● Suite 433 ● Tucson, AZ 85701
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www.azdeq.gov

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At Outfall 2, a concrete barrier had been undercut from erosion allowing discharge of turbid stormwater to Harshaw Creek. Heavy amounts of sediment was accumulating along the entrance of a culvert below Harshaw Road. Harshaw Creek has been impaired since 1992 for copper and pH.

3. Permit 69932 (AZMSG-88923) - Multi-Sector General Permit AZMSGP2010-003; Section 2.2.2

Failure to control discharge from the facility as necessary to not cause or contribute to an exceedance of an applicable water quality standard.

On July 10, 2018, the Arizona Department of Environmental Quality received a Discharge Monitoring Report with potential deficiencies to Surface Water Quality Standards. The report measured Total Zinc from Outfall #3 measured at 10.0 mg/L and above the standard of 5.106 mg/L. The permittee did not provide documentation to ADEQ of corrective action as required in Part 3.1, document the corrective actions as required in Parts 3.3 and 5.4, and report the corrective actions to ADEQ as required in Part 7.2.

II. DOCUMENTING COMPLIANCE

1. Within 30 calendar days of receipt of this Notice, please submit documentation that the violation(s) never occurred, or photographic documentation (emailed to mg7@azdeq.gov) that control measures have been replaced or installed to best engineering practices to minimize on-site erosion, sediment and the discharge of turbid stormwater.
2. Within 30 calendar days of receipt of this Notice, please submit documentation that the violation(s) never occurred, or identify the source of exceedance of Surface Water Quality Standards and submit corrective action documentation (emailed to mg7@azdeq.gov) in accordance with Section 3.3 of the MSGP:
 - Identification of the condition triggering the need for corrective action review
 - Description of the problem identified
 - Date the problem was identified
 - Summary of corrective action to be taken
 - Whether SWPPP modifications are required
 - Date corrective action initiated
 - Date corrective action completed or expected to be completed
3. Within 30 calendar days of receipt of this Notice, please submit documentation that the violation(s) never occurred, or a full Stormwater Pollution Prevention Plan uploaded to myDEQ including the \$1,000 review fee. Please note if the SWPPP does not meet minimum permit requirements it will need to be revised and resubmitted. There is a \$500 fee for each additional ADEQ review.

III. SUBMITTING COMPLIANCE DOCUMENTATION

Please send all compliance documentation and any other written correspondence regarding this Notice to ADEQ at the following address:

Arizona Department of Environmental Quality, Attention: Matthew Geiger, SWP Inspections & Compliance Enforcement Unit, 1110 W Washington St, Phoenix, AZ 85007 MC: 5415B-2

IV. STATEMENT OF CONSEQUENCES

1. The time frames within this Notice for achieving and documenting compliance are firm limits. Failure to achieve or document compliance within the time frames established in this Notice will result in an administrative compliance order or civil action requiring compliance within a reasonable time frame, substantial civil penalties, and/or the suspension or revocation of an applicable permit/license. ADEQ will agree to extend the time frames only in a compliance schedule negotiated in the context of an administrative consent order or civil consent judgment.
2. Achieving compliance does not preclude ADEQ from seeking civil penalties, and/or suspending or revoking an applicable permit/license for the violation(s) alleged in this Notice as allowed by law.

V. OFFER TO MEET

ADEQ is willing to meet regarding this Notice. To obtain additional information about this Notice or to schedule a meeting to discuss this Notice, please contact Matthew Geiger at (602) 771-4524.



Leigh Padditt, Manager
SWP Inspections & Compliance
Enforcement Unit



Matthew Geiger
SWP Inspections & Compliance
Enforcement Unit



ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY



MULTI-SECTOR GENERAL PERMIT (MSGP) - FIELD INSPECTION REPORT

Facility Name (PLACE): Trench Camp, Norton, January Mine Adit	Permit Authorization No.: AZMS 67872	
Physical Location: 31.471944, -110.763611 City, State, Zip: Harshaw, AZ	Inspection No.: 319942	
County: Santa Cruz	Inspector(s): Matt Geiger Steven Saeed	
Mailing Address: 2210 E. Fort Lowell Road City, State, Zip: Tucson, AZ, 85719	Inspector Email: mg7@azdeq.gov Inspector Phone: (602) 771 4524	
Permittee/Owner (CUSTOMER): Arizona Minerals Inc. Address: 2210 E. Fort Lowell Road, Tucson, AZ, 85719 Phone: (520) 485 1300 Email: johnny.pappas@south32.net	Inspection Date: 12-Mar-19 Inspection Start Time: 1030 Inspection End Time: 1330	
	Sector Code: G – Metal Mining Sub-Sector Code: G2 Co-located Sub-Sector(s): Sector Specific Checklist(s) Included: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A Sector specific monitoring and reporting required (8.A-8.AD): <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Co-Permittee(s)/Operator: Address: Phone: Email:		
Compliance Summary (Check Yes for Noted Deficiencies): Monitoring and Reporting: <input checked="" type="checkbox"/> Yes SWPPP: <input checked="" type="checkbox"/> Yes Inspections: <input checked="" type="checkbox"/> Yes	Reason for Inspection: <input checked="" type="checkbox"/> Compliance Inspection <input checked="" type="checkbox"/> Complaint No.: 15744 (Aquifer Protection) <input type="checkbox"/> Follow-Up No.:	
Results of Inspection: <input type="checkbox"/> No further ADEQ action will result from this inspection. <input checked="" type="checkbox"/> Potential deficiencies noted during the inspection. Additional correspondence regarding this inspection may be coming from ADEQ.		
Inspection Report issued via: email from ADEQ office	Facility Initials:	ADEQ Initials:

PRE-INSPECTION		Comments
Is the facility an inactive and unstaffed site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	
If yes, is the exemption statement maintained with the SWPPP? (1.5)	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	
Is the information on the Notice of Intent (NOI) accurate? (1.3.1,1(e))	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Does the facility have the potential to discharge to a Municipal Separate Storm Sewer System (MS4)? (1.3.1.2.e)	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	

CONTROL MEASURES (SWPPP and SITE INSPECTION) (2.1)		Comments
Is exposure minimized in areas of manufacturing, processing, and material storage? (2.1.1.1)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Material storage area containing used oil and other wastes are covered with secondary, perimeter containment. Spill kits are available.
Is good housekeeping applied (2.1.1.2)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	Several control measures to manage discharge of pollutants are in disrepair. ADEQ inspectors observed control measures that had been undercut from erosion allowing the discharge of turbid stormwater to Alum Gulch (impaired since 1996 for cadmium, copper, zinc and pH) and Harshaw Creek (impaired since 1992 for copper and pH).
Are inspections, maintenance, and repair of industrial equipment systems documented? (2.1.1.3)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	

MSGP FIELD INSPECTION REPORT

Is the facility implementing the spill prevention and response procedures as identified in the SWPPP? (2.1.1.4)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Is on-site erosion and sedimentation being managed? (2.1.1.5)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	ADEQ inspectors observed inadequate control measures to manage on-site erosion.
Is run-off being managed to minimize the discharge of pollutants? (2.1.1.6)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	ADEQ inspectors observed discharges of turbid stormwater to outfalls of Alum Gulch and Harshaw Creek.
Are piles of salt or piles containing salt used for deicing or other commercial or industrial purposes enclosed or covered? (2.1.1.7)	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	
Is the permittee conducting annual training as required by the permit? (2.1.1.9)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Are exposed areas free of litter, garbage, and floatable debris? (2.1.1.11)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Is generation of dust and off-site tracking of raw, final, or waste material minimized? (2.1.1.12)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	

EFFLUENT LIMITATIONS AND WATER QUALITY STANDARDS (2.2)		Comments
Does the facility discharge to an Impaired Water? (2.2.3)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<ul style="list-style-type: none"> Alum Gulch (impaired since 1996 for cadmium, copper, zinc and pH) Harshaw Creek (impaired since 1992 for copper and pH).
If yes, does the facility have a monitoring program as outlined in Section 6.2 of the permit? (2.2.3)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Nearest receiving surface water body: Alum Gulch and Harshaw Creek Distance: < 0.25 Miles		

CORRECTIVE ACTIONS (3.0)		Comments
Were there any conditions that would trigger a corrective action in the current reporting year? (3.1.1)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	During the inspection, ADEQ inspectors determined that modifications to control measures are necessary to meet requirements of Part 2.2. The permittee did not present documentation of prior corrective actions to ADEQ at the time of inspection.
Date(s)	Volume Discharged (gals)	Contaminant(s)
12-Mar-19		
If yes, were the discovery of the conditions documented within 72 hours of discovery	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	Trigger event on date of ADEQ's inspection 12-March-19
The corrective action(s) were documented within 14 calendar days? (3.2)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	
If yes, did the corrective action report include the appropriate information?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	
If yes, describe, the type of corrective action: (3.3)		

ROUTINE INSPECTIONS (4.1)		Comments
Routine Inspections conducted at least quarterly (4.1.1)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Date of most recent Inspection: 11-Mar-19
One Routine Inspection per year performed during rain event (4.1.1)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Inspections conducted by SWPPP designated inspectors (4.1.1)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Was the inspection documentation available for review? (4.1.2)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	

MSGP FIELD INSPECTION REPORT

Routine Inspection checklist includes all the following required elements (4.1.2):	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
<input checked="" type="checkbox"/> The inspection date and time <input checked="" type="checkbox"/> The name(s) and signature(s) of the inspector(s) <input checked="" type="checkbox"/> Weather information and a description of any discharges occurring at the time of inspection <input checked="" type="checkbox"/> Evidence demonstrating that previously unidentified discharges of pollutants have occurred from the site	<input checked="" type="checkbox"/> Any control measures needing maintenance or repairs <input checked="" type="checkbox"/> Any failed control measures that need replacement <input checked="" type="checkbox"/> Any other evidence of deviations from the permit or SWPPP observed <input checked="" type="checkbox"/> Any additional control measures needed to comply with the permit requirements	

VISUAL ASSESSMENTS (4.2)		Comments
Visual assessments performed and/or exceptions documented (4.2)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Was visual assessment documentation available for review? (4.2.2)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
If applicable, were exceptions to visual assessments documented in the SWPPP? (4.2.3)	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	
1 st visual assessment performed Summer Wet Season (June 1 – October 31)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Date of Inspection: 11-Jul-18
2 nd visual assessment performed Summer Wet Season (June 1 – October 31)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Date of Inspection: 1-Oct-18
1 st visual assessment performed Winter Wet Season (November 1 – May 31)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Date of Inspection: 7-Dec-18
2 nd visual assessment performed Winter Wet Season (November 1 – May 31)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Date of Inspection: 7-Jan-19
Visual assessments performed following all required procedures (4.2.1)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Visual sample documentation includes all the following required elements (4.2.2)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
<input checked="" type="checkbox"/> Sample locations <input checked="" type="checkbox"/> Sample collection date and times for each sample <input checked="" type="checkbox"/> Visual assessment date and time for each sample <input checked="" type="checkbox"/> Person collecting the sample and signature <input checked="" type="checkbox"/> Person conducting visual assessment and signature	<input checked="" type="checkbox"/> Nature of the stormwater discharge <input checked="" type="checkbox"/> Results of the observations of the stormwater discharge <input checked="" type="checkbox"/> Probable sources of any observed stormwater contamination <input checked="" type="checkbox"/> If applicable, reason why it was not possible to take sample within the first 30 minutes.	

COMPREHENSIVE FACILITY INSPECTIONS (CFI) (4.3)		Comments
CFI for Inactive and Unstaffed Site in lieu of Routine Inspection (4.1.3)	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	
Conducted at least six months apart (4.3.1)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Date of last CFI: 21-Jun-18
Inspections conducted by SWPPP designated inspectors (4.1.1)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Was the inspection documentation available for review? (5.9)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	ADEQ inspectors asked on-site representative for documentation of a Comprehensive Facility Inspection. No documentation was provided at time of inspection. Documentation was later provided to the inspector via email.
CFI documentation includes all the following required elements (4.3.1- 2)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	

MSGP FIELD INSPECTION REPORT

<input checked="" type="checkbox"/> The date and time of the inspection <input checked="" type="checkbox"/> The name(s) and title(s) of the personnel conducting the inspection <input checked="" type="checkbox"/> Findings from the examination of areas identified in Part 4.3.1 of the permit <input checked="" type="checkbox"/> Any required revisions to the SWPPP resulting from the inspection <input checked="" type="checkbox"/> Any incidents of noncompliance observed <input checked="" type="checkbox"/> Certification the facility is in compliance with the permit <input checked="" type="checkbox"/> Signed and certified in accordance with Appendix B of the permit	<input checked="" type="checkbox"/> All observations relating to the implementation of the control measures including: <ul style="list-style-type: none"> • Previously unidentified discharges from the site • Previously unidentified pollutants in existing discharges • Evidence of, or potential for, pollutants entering the drainage system that are not contemplated in the SWPPP • Evidence of pollutants discharging to surface waters from any facility outfall(s) in a manner inconsistent with the SWPPP • Condition of and around the outfall(s) • Condition of flow dissipation measures • Additional control measures needed to address any conditions requiring corrective action
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STORM WATER POLLUTION PREVENTION PLAN (SWPPP) (5.0)		Comments
SWPPP available for inspection	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	SWPPP presented to ADEQ at time of inspection was written in March 2016. A letter received by ADEQ in March 2018 in response to a previous Notice of Violation refers to "a more current SWPPP, signed in November 2017". This 2017 SWPPP was not presented at time of inspection. Inspected documentation may be incomplete and outdated. On-site documentation is poorly managed and site representative did not know location of "more current" documentation.
SWPPP contains at least the following (5.1):		Comments
Identification of the SWPPP team (5.1.1)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Description of the industrial activities at the facility (5.1.2.1)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
General location map (5.1.2.2)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
A legible site map completed to scale that identifies at a minimum the following elements: (5.1.2.3)		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
<input checked="" type="checkbox"/> Size of the property in acres <input checked="" type="checkbox"/> Location and extent of significant structures and impervious surfaces <input checked="" type="checkbox"/> Directions of stormwater flow <input checked="" type="checkbox"/> Locations of stormwater conveyances <input checked="" type="checkbox"/> Locations of existing structural control measures <input checked="" type="checkbox"/> Locations of surface waters receiving the facility's discharges and any impaired waters within 2.5 miles downstream of facility <input type="checkbox"/> Locations where the facility's stormwater discharges to a regulated MS4 <input checked="" type="checkbox"/> Locations of potential pollutant sources identified under part 5.1.3.2 of the permit <input type="checkbox"/> Locations where significant spills or leaks identified under Part 5.1.3.3 of the permit <input checked="" type="checkbox"/> Locations of all stormwater monitoring points <input checked="" type="checkbox"/> Locations of stormwater inlets and outfalls, with a unique identifier for each outfall <input type="checkbox"/> Identification of "substantially identical" outfalls	<input checked="" type="checkbox"/> Approximate areas draining to each outfall <input type="checkbox"/> Identification of all outfalls having the potential to contain allowable non-stormwater discharges under Part 1.1.3 of the permit and the corresponding type(s) of discharges <input type="checkbox"/> Location of on-site drywell(s) and their registration numbers <input checked="" type="checkbox"/> Locations of the following activities exposed to stormwater with a potential to discharge: <ul style="list-style-type: none"> • Fueling stations • Vehicle and equipment maintenance and/or cleaning areas • Loading and unloading areas • Locations used for the treatment/storage/disposal of wastes • Liquid storage tanks • Processing and storage areas • Access roads and rail lines used to transport raw materials/manufactured products/waste material/by-products used or created at the facility • Transfer areas for substances in bulk • Machinery <input checked="" type="checkbox"/> Locations of sources of run-on to the facility from adjacent property(s) that contain significant quantities of pollutants	
Potential pollution sources listed (5.1.3)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Location and type of control measures implemented at the site. (5.1.4)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	

MSGP FIELD INSPECTION REPORT

Maintenance measures, procedures, and schedules for all industrial equipment and systems exposed to stormwater (5.1.5)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Documented procedures for preventing and responding to spills and leaks (5.1.5.1)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Training for Sector specific requirements (5.1.5.1)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Documented procedures for conducting monitoring as specified in the permit (5.1.5.2)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Documented procedures for conducting inspections as specified in the permit (5.1.5.2)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Are substantially identical outfalls identified and appropriately documented in the SWPPP? (5.1.5.2)	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	
Is the SWPPP signed and dated as required by the permit? (5.1.6)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
All documents signed by Duly Authorized Representative (Appendix B, Subsection 9)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Documents to be included in the SWPPP (5.4):		Comments
Copy of Notice of Intent (NOI)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	No copy of current NOI included in SWPPP.
Copy of current General Permit	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Descriptions and dates of any incidences of significant spills, leaks or other releases resulting in discharge	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Record of employee training including dates (may be kept separate from SWPPP)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Date of last Training: 18-Jan-19
Repairs of structural control measures including details and dates (may be kept separate from SWPPP)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Rationale for deviations from visual assessment and monitoring schedules	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Corrective actions including triggering events and dates	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	No documentation provided at time of inspection.
Documentation to support permittee's claim that site is inactive and unstaffed	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Modifications or changes to SWPPP are signed and dated (5.2)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	

MONITORING AND REPORTING (6.0 and 7.0)		Comments
Select all required analytical monitoring (6.2.1)	<input type="checkbox"/> None required <input checked="" type="checkbox"/> General Analytical monitoring (mining) <input type="checkbox"/> Benchmark monitoring (non-mining) <input type="checkbox"/> Effluent Limitation monitoring <input checked="" type="checkbox"/> Impaired Waters monitoring <input type="checkbox"/> ADEQ Additional monitoring	Subsector G2 – Silver Ore
Are the correct parameters being measured?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Any exceedances of numeric effluent limits or water quality standards?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	July 2018 Discharge Monitoring Report included the following potential deficiencies of Surface Water Quality Standard. <ul style="list-style-type: none"> • Outfall #1 pH 6.4 (SWQS 6.5 – 9) • Outfall #2 pH 5.8 (SWQS 6.5 – 9) • Outfall #3 pH 6.0 (SWQS 6.5 – 9)

MSGP FIELD INSPECTION REPORT

		<ul style="list-style-type: none"> Outfall #3 Total Zinc 10 mg/L (SWQS 5.106 mg/L)
If yes, were exceedance reports submitted to ADEQ?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	July 10, 2018
If yes, was monitoring continued at least twice per wet season until the discharge was in compliance or ADEQ waived the monitoring requirement?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Ongoing monitoring. ADEQ has yet to receive more recent documentation.
Sampling and Analysis Plan contains the following (6.1.3): <input checked="" type="checkbox"/> Designate and train personnel to collect, maintain, and handle samples <input checked="" type="checkbox"/> Identify water quality parameters/pollutants to be sampled		
Written procedures for: <input checked="" type="checkbox"/> Sample collection <input checked="" type="checkbox"/> Tracking <input checked="" type="checkbox"/> Preservation <input checked="" type="checkbox"/> Handling		
Are all monitoring instruments and equipment calibrated and maintained in accordance with manufacturer's recommendation? (6.1.3.2)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Except for field parameters, are all samples analyzed by a laboratory licensed with ADHS? (6.1.3.3)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	ADEQ observed a "Chain of Custody/ Laboratory Analysis Request" for Turner Laboratories Inc. of Tucson.
Are annual reports submitted to ADEQ prior to July 15 th (OAW or TMDL only)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Are annual reports for the period June 1 to May 31 completed by July 15 th , and maintained with the SWPPP?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Discharge Monitoring Reports (DMR) submitted prior to July 15 th (if required) (7.1.3)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Submitted July 20, 2018
All inspections, monitoring, and certification records (7.5)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	

SITE INSPECTION	Comments	
Were any discharges or evidence of discharges observed? If yes, describe in comments.	Stormwater	Turbid stormwater was observed discharging from outfalls to both Alum Gulch and Harshaw Creek during a storm event on March 12, 2019
Control measures consist of what was identified in the SWPPP?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Control measures are effective?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	Inadequate and damaged control measures result in turbid stormwater discharge.
Spill response equipment available?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Maintenance, procedures, and schedules are conducted as written in the SWPPP?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	

OBSERVATIONS, RECOMMENDATIONS, AND POTENTIAL DEFICIENCIES:
<p>South32 is the new parent company for Arizona Minerals Inc. following an acquisition in August 2018. All permits are still held by the operating company Arizona Minerals Inc.</p> <p>The Arizona Department of Environmental Quality had previously issued Notice of Violations for surface water violations at Trench Camp following inspections in 2014 (to ASARCO) and 2018 (to Arizona Minerals Inc.). Both cases were dismissed following change of ownership or documented compliance respectively.</p> <p>Trench Camp discharges to the following surface waters:</p> <ul style="list-style-type: none"> Alum Gulch (Outfall 1) impaired since 1996 for cadmium, copper, zinc and pH Harshaw Creek (Outfall 2) impaired since 1992 for copper and pH Harshaw Creek (Outfall 3) approximately 0.20 miles downstream from end of impairment

MSGP FIELD INSPECTION REPORT

The Discharge Monitoring Report submitted to ADEQ on July 10, 2018 included several potential deficiencies to Surface Water Quality Standards. These include pH measured below standards at Outfalls 1, 2 and 3 and Total Zinc measured at nearly twice the standard at Outfall #3.

On March 12, 2019, inspectors from ADEQ conducted an unannounced inspection of Trench Camp, Norton, January Mines Adit (AZMS 67872) or "Hermosa" by Arizona Minerals Inc. During a light storm event, ADEQ inspectors observed a discharge of brown, turbid stormwater to outfalls of the impaired waters of Alum Gulch (Outfall 1) and Harshaw Creek (Outfall 2). ADEQ noted inadequate control measures to reduce the discharge of pollutants. Several measures were in disrepair, improperly installed or had been undercut from erosion and must be reported as a corrective action. No documentation of corrective actions were made available to ADEQ at the time of inspection.

Outfall 1: Several straw wattles observed in disrepair and/or installed incorrectly. A silt fence was improperly installed across Alum Gulch. Turbid stormwater was discharging to Alum Gulch at time of inspection.

Outfall 2: A concrete barrier protecting discharge to Harshaw Creek had been undercut from erosion allowing discharge of turbid stormwater. Heavy amounts of sediment was accumulating along the entrance of a culvert under Harshaw Road.

The Stormwater Pollution Prevention Plan presented to ADEQ at time of inspection was written in March 2016. A letter received by ADEQ in March 2018 in regards to a previous Notice of Violation refers to "a more current SWPPP, signed in November 2017". This SWPPP was not presented at time of inspection. The documentation inspected may be incomplete and outdated. On-site documentation is poorly managed and site representative did not know location of "more current" documentation.

Sector G Metal Mines – Exploration and Construction Phases		Comments
Additional Controls [8.G.4.1]		
Are controls designed and maintained to control volume and velocity to minimize soil erosion?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	Several control measures undercut from erosion allowing stormwater to pass below as observed at time of inspection.
Are controls designed and maintained to control stormwater discharges by minimizing both peak flow rates and total volume to minimize erosion?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	Measures were not maintained at time of inspection.
Are controls designed and maintained to phase or sequence exploration and construction activities as practicable to minimize the area of disturbance at any one time?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Are controls designed and maintained to minimize sediment discharges from the site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	Measures were not maintained at time of inspection. Inspectors observed turbid stormwater discharging from Outfalls 1 and 2.
Where practicable, are controls designed to increase sediment removal and maximize stormwater infiltration and or reuse?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Where practicable, are controls designed and maintained to minimize soil compaction and preserve top soil?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	ADEQ observed insufficient measures to preserve top soil. Mulch covers were sparsely dispersed on locations within site.
Were control measures identified in the SWPPP maintained in effective operating condition?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	Outfall 1: Several straw wattles observed in disrepair and/or installed incorrectly. A silt fence was improperly installed across Alum Gulch. Outfall 2: A concrete barrier protecting discharge to Harshaw Creek had been uncut from erosion allowing discharge of turbid stormwater.
Were discharges from dewatering or basin draining activities discharged in a manner that do not cause nuisance conditions, including erosion in receiving channels or on surrounding properties?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	
Was discharge of pollutants from equipment and vehicle washing, wheel wash water, and other wash water minimized? Wash water must be treated in a sediment basin or alternative control that provides equivalent or better treatment prior to discharge?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	
Are measures in place to minimize the exposure of building materials, building products, construction wastes, trash, landscape materials, fertilizers, pesticides, herbicides, detergents, sanitary wastes, and other materials present on site to precipitation and to stormwater?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Was discharge of pollutants from spills and leaks minimized?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Were chemical spill and leak prevention and response procedures implemented?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	

Were prohibited discharges from wastewater from washout of concrete observed?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	
Were prohibited discharges from wastewater from washout of stucco, paint, form release oils, curing compounds and other construction materials observed?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	
Were prohibited discharges of fuels, oils, and other pollutants in vehicle and equipment in operation observed?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	ADEQ observed an oily sheen on a roadway near the material storage area. The facility placed absorbent material over the sheen while ADEQ was still on-site.
Were prohibited discharges from soaps or solvents observed?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	
Are measures implemented where culverts or other surface outlets are present on the site to minimize the threat of erosion and prevent the formation of rills and gullies?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Culverts at Outfall 1 were being replaced at time of inspection.
Are Good housekeeping measures implemented to ensure litter, debris, and chemical are prevented from contact with stormwater?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Were control measures maintained in the SWPPP until stabilization is achieved or active mining commences at the site?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	
Additional SWPPP Requirements [8.G.4.2]		Does the SWPPP include:
Are construction activities that can potentially affect stormwater discharges documented in the SWPPP?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Is a description of exploration and construction activities documented in the SWPPP?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Estimate of total acreage to be disturbed?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Additional Inspection Requirements [8.G.4.3]		
Are Inspections conducted every 30 calendar days and within 24 hours of the end of each measurable storm event?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
If Impaired or OAW, are inspections conducted every 7 calendar days?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Are all areas disturbed by clearing, grading, and/or excavation activities exposed to sedimentation inspected?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Are discharge locations inspected to determine whether erosion control measures are effective where accessible and in downstream locations where not accessible?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	ADEQ inspectors observed an accumulation of sediment at Outfalls 1 and 2 suggesting ineffective erosion control measures on-site.
Are areas vehicles enter or exit site inspected for off-site tracking?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	ADEQ inspectors did not observe any control measures at site exits to minimize off-site tracking to Harshaw Road. Note: Harshaw Road is unpaved for approximately 3 miles from site toward Patagonia.