COLORADO
Department of Public Health & Environment

December 2, 2019

V Chris Pyles, Pres
Gillette Sand and Gravel
20575 Hwy 24
Woodland Park, CO 80863
utesng@yahoo.com

RE: Facility Inspection / Compliance Advisory
Gillette Sand and Gravel
CDPS Permit Certification - COG501770

Mr. Pyles:

The Water Quality Control Division (the division) inspected the above referenced facility on November 6, 2019. The inspection procedure consisted of two parts, a review of records and onsite observations of the facility. Findings identified during the inspection are detailed in the enclosed inspection report.

This correspondence documents:

1. The division's expectations for correcting the inspection findings.
2. Whether the division requires a response to the inspection report.

All discharges authorized by the Colorado Discharge Permit System (CDPS) General Permit for Discharges from Sand and Gravel Mining and Processing (And Other Nonmetallic Minerals Except Fuel) (COG500000) (the permit) must be consistent with all terms and conditions of the permit. Therefore, the division expects Gillette Sand and Gravel (the permittee) to correct all findings identified in the enclosed inspection report and return the facility to compliance with the permit. A violation of the terms and conditions specified in this permit may be subject to civil and criminal liability pursuant to sections 25-8-601 through 612, C.R.S. Correcting a permit violation does not remove the original violation.

While the division expects Gillette Sand and Gravel (the permittee) to correct all findings noted in the enclosed inspection report and return the facility to compliance with the permit, at this time the permittee **is not** required to submit a written response to the enclosed inspection report.

This Compliance Advisory is intended to advise Permittee of potential violations of the Colorado Water Quality Control Act and it's implementing regulations and permits, so that appropriate steps can be taken to avoid or mitigate formal enforcement action or to correct our records (if applicable). This Compliance Advisory does not constitute a Notice of Violation or Cease and Desist Order and is not subject to appeal. The issuance of this Compliance Advisory does not limit or preclude the division from pursuing its enforcement options concerning the potential violation(s).

Please contact me with any questions at 303 691 4021 or al.stafford@state.co.us.

Regards,

Al Stafford
Environmental Protection Specialist
Clean Water Compliance Unit
WATER QUALITY CONTROL DIVISION

cc: Permit File
Elliott Russell, DRMS, elliott.russell@state.co.us
Brendan Shine, Realtime Aquifer Services, bren.shine@q.com

SAND AND GRAVEL MINING AND PROCESSING INSPECTION REPORT

Gillette Sand and Gravel

Permittee: Gillette Sand and Gravel
Cert#: COG501770
Legally Responsible Person: V Chris Pyles
Title: Pres

Facility: Gillette Sand and Gravel
Inspector: Al Stafford
Address: Gillette
MS4/County: NA/Teller

Receiving Water: West Fork of West Beaver Creek
Authorized Outfalls: 001-A

Inspection Began: 11/6/2019 10:30 AM
Inspection Completed: 11/6/2019 1:00 PM

Persons Present: Chris Pyles, Ken Depoy (Gillette Sand and Gravel); Al Stafford (WQCD)

The purpose of division inspections is to evaluate and document compliance with the Colorado Discharge Permit System (CDPS) General Permit for Discharges From Sand and Gravel Mining and Processing (And Other Nonmetallic Minerals Except Fuels) (the permit). This report is the result of a "point in time" inspection and therefore only documents this facility's conditions, as they existed at the time of the inspection. Division inspection oversight does not pre-empt nor supersede the authority of local agencies to prohibit, restrict, or control discharges of construction dewatering source water to municipal storm drain systems or other stormwater conveyances within their jurisdiction.

During the inspection closing conference the division inspector reviewed all alleged inspection findings with the facility representative(s). The inspector communicated the division's expectation that the facility representative initiate corrective actions immediately for all alleged inspection findings, in accordance with the provisions of the CDPS General Permit for Sand and Gravel Mining and Processing (And Other Nonmetallic Minerals Except Fuels).

RECORDS REVIEW

Note 1: The year of the original permit certification effective date was 1993. The date industrial activities covered under this permit began at the site was January 1, 1992. The permittee has the potential to discharge from two unauthorized outfalls: one at the low point where stormwater from the central portion of the site collects on the west side of the site and has the potential to discharge to the "small tributary stream," and one at the culvert discharging from the eastern sediment pond to the "small tributary stream"/beaver dam area. This information was provided to the inspector by Chris Pyles, President.

Note 2: In a communication with the permittee prior to the inspection, the division inspector requested a duplicate copy of the following documents be provided to division personnel during the inspection: monitoring records, visual assessment documentation, inspection reports, corrective action reports, the stormwater management plan, and annual reports. This was provided to the inspector on November 5, 2019.

Note 3: The division inspection was in response to a complaint issued by the Division of Reclamation, Mining, and Safety (DRMS). DRMS inspected the site on October 4, 2019, in response to citizen complaints regarding murky water in the West Fork of West Beaver Creek. The murky water was due to a spill of process water from the sediment ponds located along the western perimeter of the northern portion of the site that occurred on October 3, 2019. These ponds are not designed to discharge, and discharge was due to a combination of excess stormwater being contributed to the ponds, as well as lack of pond maintenance. According to Chris

Pyles, president, the discharge occurred for approximately 45 minutes, and resulted in the discharge of approximately 1,400 gallons of process water. The permittee took corrective actions on October 4, 2019, to reinforce and increase the size of the berm located on the down gradient side of the ponds. DRMS conducted a follow up inspection on October 16, 2019, and concluded that "process pond discharge impacts appear to have been temporary."

1. Quarterly visual assessments have not been documented. According to onsite personnel Chris Pyles and Ken Depoy, stormwater has not discharged from the site.

The quarterly visual assessment documentation shall document the following as required by Part I.I.1 of the permit:

- If no discharge has occurred during the quarterly monitoring period the stormwater management plan shall contain a note for each monitoring period stating that no discharge has occurred during that period.

The division expects the permittee to establish and maintain quarterly visual assessment documentation to include all items required by the permit.

2. A copy of the inspection reports were retained on site. The division inspector reviewed a subset of inspection records between March 21, 2017 and October 3, 2019. The inspection records were found to be inadequate for the following reasons:

The inspection records consisted of a summary report and a schedule of implementation of the corrective actions that the permittee has taken or plans to take if the site inspection indicates that the site is out of compliance, but did not contain the other information required by the permit.

a) Inspections must be performed and/or documented as required by Part I.J.2 and I.J.3 of the permit.

Each inspection report shall include:

- The inspection date and time;
- Locations inspected;
- Weather information and a description of any discharges occurring at the time of the inspection;
- A statement that, in the judgment of 1) the person conducting the site inspection, and 2) the person described in Part I.F.4 (Reporting and Recordkeeping), the site is either in compliance or out of compliance with the terms and conditions of this permit, with respect to Part I.J.2 (Inspection Scope);
- Name, title, and signature of the person conducting site inspection; and the following statement: "I certify that this report is true, accurate, and complete, to the best of my knowledge and belief.";
- Certification and signature of the person described in Part I.F.4 (Reports and Recordkeeping), or a duly authorized representative of the facility thereof.

The division expects the permittee to conduct and document inspections as required by the permit.

3. A copy of the corrective action reports were retained on site. The inspector reviewed a subset of corrective action reports between March 21, 2017 and October 31, 2019. The corrective action reports were found to be adequate.

4. A copy of the stormwater management plan was retained on site. The division inspector reviewed the plan and found it to be inadequate for the following reasons:

The stormwater management plan consisted of a site map, and did not include a narrative portion of the plan or other permit requirements listed below.

a) The stormwater management plan did not identify the stormwater management plan administrator.

The stormwater management plan shall identify a specific individual by name or by title.

b) The facility description section did not adequately describe the components listed below as required by Part I.M.2 of the permit.

- A narrative description of the industrial activities conducted at the facility;
- The total size of the facility property in acres;
- The general layout of the facility including mining areas, revegetated areas, buildings, raw material storage areas, and the flow of goods and materials through the facility.

The division expects the permittee to update the site description section of the stormwater management plan to include all items required by the permit.

c) The facility map(s) associated with the stormwater management plan did not identify items described below as required by Part I.M.3 of the permit.

The facility map did not identify the locations of stormwater outfalls, areas used for storage of materials or overburden, the location of the process water spill observed on October 3, 2019, or the locations of stormwater monitoring points. While the map identified that it was originally prepared on October 15, 2003, the date of the map amendments was not included.

The stormwater management plan shall include a legible site map(s), showing the entire site, and vicinity as appropriate, and identify:

- The locations of stormwater inlets and outfalls, with a unique identification code for each outfall (e.g., Outfall No. 001, No.002, etc), and indicating whether one or more outfalls are "substantially identical" under Part I.H (General Monitoring Requirements); and an approximate outline of the areas draining to each outfall.
- The locations of all actual or potential pollutant sources (including sediment) associated with mining and processing activities, including but not limited to those identified in the Facility Inventory and Assessment of Pollutant Sources (below) and the following:
    - Areas used for storage or disposal of overburden, materials, soils or wastes; and
    - Areas used for mineral milling and processing.
- The locations where significant spills or leaks identified under Part I.L.4.b have occurred.
- The locations of all stormwater monitoring points applicable to the facility (visual monitoring; benchmark monitoring, water quality-based monitoring).
- The date that the facility site map was prepared and/or amended.

The division expects the permittee to update the site map(s) to include all items required by the permit.

d) The facility inventory and assessment of pollutant sources associated with the stormwater management plan did not identify items described below as required by Part I.M.4 of the permit.

- The inventory of facility activities and equipment shall identify all areas (except interior areas that are not exposed to precipitation) associated with industrial activities that have been, or may potentially be, sources of pollutants, that contribute, or have the potential to contribute, any pollutants to stormwater, including but not limited to the following:
    - Loading and unloading of materials, including solids and liquids.

- Outdoor storage of materials or products, including solids and liquids.
- Outdoor manufacturing and processing.
- On-site dust or particulate generating processes, including dust collection devices and vents.
- On-site waste treatment, storage, or disposal, including waste ponds and solid waste management units.
- Vehicle and equipment fueling, maintenance, and/or cleaning (includes washing).
- Immediate access roads and rail lines used or traveled by carriers of raw materials, manufactured products, waste material, or by-products used or created by the facility.
- Roofs or other surfaces exposed to air emissions from a manufacturing building or a process area.
- Roofs and associated surfaces composed of galvanized materials that may be mobilized by stormwater (e.g., roofs, ducts, heating/air conditioning equipment, gutters and downspouts).

- The inventory of materials shall list materials that contribute, or have the potential to contribute, pollutants to stormwater, including but not limited to the following:
  - The types of materials handled at the facility that may be exposed to precipitation or runoff and could result in stormwater pollution.
  - The types of materials handled at the facility that may leak or spill, and be exposed to precipitation or runoff and result in stormwater pollution.
  - A narrative description of any potential sources of pollutants from past activities, materials and spills that could contribute pollutants to stormwater discharges, and the corresponding outfall(s) that would be affected by such spills and leaks. The description shall include the method and location of any on-site storage or disposal; and documentation of all significant spills and leaks of oil or toxic or hazardous pollutants that occurred at exposed areas, or that drained to a stormwater conveyance, in the 3 years prior to the SWMP preparation date.
- The assessment of potential pollutant sources shall provide a short narrative or tabulation describing the potential of a pollutant to be present in stormwater discharges for each facility activity, equipment and material identified above, including but not limited to the following:
  - Loading and unloading operations;
  - Outdoor storage of chemicals or equipment;
  - Crushing facilities or significant dust and particulate generating activities;
  - On site waste disposal practices;
  - Stockpiles of overburden, raw material, intermediate products, byproducts, finished products or waste products;
  - Asphalt or concrete batch plants or areas used for recycling of asphalt or concrete;
  - Routine maintenance activities involving fertilizers, pesticides, detergents, fuels, solvents, oils, etc.;
  - Haul roads; and
  - Disturbed and revegetated areas.

The division expects the permittee to update the facility inventory and assessment of pollutant sources to include all items required by the permit.

e) The stormwater management plan did not include the location, installation date, and type of each nonstructural and structural control measure implemented at the facility to achieve meet the effluent limitations, as required by Part I.M.5 of the permit.

The site map identified the location and type of each control measures implemented at the facility. However, it did not include installation dates.

The division expects the permittee to update the description of control measures to include all items required by the permit.

f) The stormwater management plan did not include the installation and implementation specifications for each control measure used by the permittee to meet the effluent limitations contained in this permit, as required by Part I.M.6 of the permit.

The division expects the permittee to update the control measures specifications to include all items required by the permit.

g) The stormwater management plan did not include the following schedules, procedures, and evaluation results, as required by Part I.M.6 of the permit.

- To document good housekeeping, the stormwater management plan shall contain a schedule for regular pickup and disposal of waste materials, along with routine inspections for leaks and conditions of drums, tanks and containers, in accordance with Part I.C.2.a.ii of the permit.
- To document maintenance, the stormwater management plan shall contain preventative maintenance schedules for industrial equipment and systems; control measures; and any back-up practices in place should a runoff event occur while a control measure is off-line, in accordance with Part I.C.2.a.iii of the permit.
- To document spill prevention and response procedures, the stormwater management plan shall contain procedures for preventing, responding to, and reporting spills and leaks in accordance with Part I.C.2.a.iv of the permit.
- To document employee training, the stormwater management plan shall contain a schedule for all types of training required by this permit, content of the training, and log of the dates on which specific employees received training, in accordance with Part I.C.2.a.viii of the permit.
- To document non stormwater discharges, the stormwater management plan shall contain documentation of the stormwater conveyance system evaluation for the presence of non-stormwater discharges not authorized in Part.I.A.1.c, and the elimination of all unauthorized discharges, including the following information:
    - The date of any evaluation;
    - A description of the evaluation criteria used;
    - A list of the outfalls or onsite drainage points that were directly observed during the evaluation;
    - The different types of non-stormwater discharge(s) and source locations; and
    - The action(s) taken, such as a list of control measures used to eliminate unauthorized discharge(s), if any were identified.

The division expects the permittee to update the stormwater management plan to include all additional control measure documentation required by the permit.

h) The stormwater management plan did not include the following requirements for procedures for performing the facility inspections, as required by Part I.M.7 of the permit.

- Person(s) or positions of person(s) responsible for inspection;
- Schedules for conducting inspections, including tentative schedule for facilities in climates with irregular stormwater runoff discharges; and
- Specific items to be covered by the inspection, including inspection schedules for specific outfalls.
- Permittees that invoke the exception to quarterly inspections for inactive and unstaffed facilities must include in the SWMP the signed and certified documentation to support this claim.

The division expects the permittee to update the inspection procedures portion of the stormwater management plan to include all items required by the permit.

i) The stormwater management plan did not include the following requirements for procedures for performing any applicable types of monitoring, as required by Part I.M.8 of the permit.

- Locations where samples are collected, and outfall identification by its unique identifying number;
- Staff responsible for conducting stormwater sampling;
- Procedures for sample collection and handling, including any deviations from sampling within the first 30 minutes of a measurable storm event;
- For any parameters requiring analysis, the name of the parameter, the holding times and preservatives, the analytical methods used, and the laboratory quantitation levels;
- Procedures for sending samples to a laboratory, as applicable;
- Monitoring schedules, including any deviations from the monitoring schedule for alternate monitoring periods for climates with irregular stormwater runoff (see Part I.H.5);
- The numeric control values (benchmarks, TMDL-related requirements, or other requirements) applicable to discharges from each outfall.
- Permittees that invoke the Monitoring Exceptions for Inactive and Unstaffed Sites and for Completed and Finally Stabilized Areas, must include in the SWMP the signed and certified documentation to support this claim.
- Permittees that use the substantially identical outfall monitoring exception (Part I.H.1) must document the following:
    - Location of each of the substantially identical outfalls, and the outfall sampled;
    - Description of the general industrial activities conducted in the drainage area of each outfall;
    - Description of the control measures implemented in the drainage area of each outfall;
    - Description of the exposed materials located in the drainage area of each outfall that are likely to be significant contributors of pollutants to stormwater discharges;
    - Impervious surfaces in the drainage area that could affect the percolation of stormwater runoff into the ground (e.g., asphalt, crushed rock, grass, etc.);
    - Why the permittee expects the outfalls to discharge substantially identical effluents.

The division expects the permittee to update the inspection procedures portion of the stormwater management plan to include all items required by the permit.

5. The inspector reviewed a subset of annual reports between 2017 and 2018. The annual reports were found to be inadequate for the following reasons:

Annual reports were not submitted to the division by February 28th of the year following the reporting period. Neither of the annual reports submitted indicate that visual monitoring is required on site.

Reporting Period	Date Annual Report Due	Date Annual Report Received	Days Delinquent
2017	2/28/2018	4/27/2018	58
2018	2/28/2019	10/11/2019	225

a) Annual reports must be completed for the reporting period from January 1 to December 31 and submitted by the permittee to the division no later than February 28 of the year following the reporting period.

The division expects the permittee to submit annual reports to the division no later than February 28 following the monitoring period.

b) The annual reports did not include the following requirements, as required by Part I.N.2 of the permit.

- Summary of visual monitoring

The division expects the permittee to update the annual reports to include all items required by the permit.

Note 4: As required by Part I.C.2 of the permit, the permittee must adhere to all practice based effluent limitations included in the permit.

As required by Part I.G of the permit, all control measures used by the permittee to meet the effluent limitations contained in this permit must be:

- Selected, designed, installed, implemented, and maintained in accordance with good engineering, hydrologic and pollution control practices.
- Consistent with the installation and implementation specifications identified in the stormwater management plan.

Note 5: The findings identified below provide specific observations of field deficiencies. It remains the permittee's responsibility to ensure that all permit requirements, terms, and conditions are met for the entire construction site.

Note 6: **Drainage Path A:** Stormwater from the southern portion of the site flows via sheet flow to low points that are bermed along the south side of the small tributary stream that discharges to the West Fork of West Beaver Creek. This location does not discharge.

Drainage Path B: Stormwater from the western central portion of the site flows via sheet flow to a bermed low point on the northern side of the small tributary stream that discharges to the West Fork of West Beaver Creek. Given the size of the contributing area, discharge may occur from this location. This is currently an unauthorized outfall.

Drainage Path C: Stormwater from the northern portion of the site flows via sheet flow to the process water ponds, where it commingles with process water. This water is recycled in the wash process and is not intended to discharge (refer to Note 3 above).

Drainage Path D: Process water (stormwater that gathers in and is discharged from the active mining area) from the eastern portion of the site flows via sheet flow to the eastern sediment pond and discharges to the upper portion of the small tributary stream that discharges to the West Fork of West Beaver Creek. This is currently an unauthorized outfall.

1. Two unauthorized outfalls were observed during the inspection: one process water, and one stormwater.

   The unauthorized stormwater outfall is located at the bermed low point on the northern side of the small tributary stream that discharges to the West Fork of West Beaver Creek. The certification currently lists the stormwater outfall at Latitude 38.7809, Longitude -105.1197. However, the actual potential stormwater discharge location is located approximately 340 feet southeast of the authorized location (refer to Note 6, Drainage Path B).

   The unauthorized process water outfall is located at the culvert outfall from the eastern sediment pond, where mine dewatering water is discharged (refer to Note 6, Drainage Path D, and photographs 8 – 12). Per Part I.A.1.a.i of the permit, mine dewatering includes any water, including groundwater, seepage, and stormwater (precipitation and surface runoff), that is impounded or that collects in the mine pit (surface or underground workings) and is pumped, drained, or otherwise removed from the mine through the efforts of the mine operator. While the division inspector did not observe discharge from this location, according to Ken Depoy, discharge was observed from this location last spring.

   Per the opening section of the sand and gravel permit, the permit specifically authorizes the entity identified in the certification of the permit to discharge process water and stormwater at the location(s) described in the certification of the permit, to waters of the state as identified in the certification of the permit.

The division expects the permittee to modify the certification to include all potential stormwater and process water outfalls.

2. A portion of the berm adjacent to the small tributary stream was approximately one foot tall, and there was a gap in a section of the berm (refer to photograph 1).
   - Finding: Control measures were not installed as required in the specification provided in the stormwater management plan (refer to Part I.L.1 of the permit).
     - The site map included in the stormwater management plan directs that the berm in this location shall have a ten foot base and be four feet high and five feet wide.
   - Location: Western portion of the site, south of the small tributary stream
   - Pollutant Source: Sediment from disturbed areas and stockpiles
   - Down Gradient Control Measures: Additional control measures were not implemented down gradient of this location.
   - Result: There was a potential discharge of pollutants to a water of the state as identified in Note 6, drainage path A.

3. Control measures were not implemented to manage runoff from sediment pushed over the berm during snow plowing operations (refer to photograph 2).
   - Finding: The permittee did not stabilize exposed areas and manage runoff using structural and/or non-structural control measures to minimize onsite erosion and sedimentation, and the resulting discharge of pollutants (refer to Part I.C.2.a of the permit).
   - Location: North side of western culvert
   - Pollutant Source: Sediment from disturbed areas
   - Down Gradient Control Measures: Additional control measures were not implemented down gradient of this location.
   - Result: There was a potential discharge of pollutants to a water of the state as identified in Note 6, drainage path B.

4. Berm was not compacted (refer to photographs 3 - 5).
   - Finding: Control measures used by the permittee to meet the effluent limitations were not installed in accordance with good engineering hydrologic and pollution control practices and/or the manufacturer's specifications (refer to Part I.G of the permit).
     - In accordance with industry standards and good engineering, hydrologic, and pollution control practices, the installation and implementation specifications for earth dikes developed by Mile High Flood District's Urban Storm Drainage Criteria Manual Vol 3 directs that the embankment is to be compacted to 90% of maximum density and within 2% of optimum moisture content according to ASTM D698.
   - Location: West side of western sediment ponds
   - Pollutant Source: Sediment from disturbed areas
   - Down Gradient Control Measures: Additional control measures were not implemented down gradient of this location.

- Result: There was a potential discharge of pollutants to a water of the state as identified in Note 6, drainage path C.

5. Hay bales were not tightly adjoined, and bales were not staked into the ground (refer to photographs 6 and 7).
   - Finding: Control measures used by the permittee to meet the effluent limitations were not installed in accordance with good engineering hydrologic and pollution control practices and/or the manufacturer's specifications (refer to Part I.G of the permit).
     - In accordance with industry standards and good engineering, hydrologic, and pollution control practices, the installation and implementation specifications for straw bale barrier developed by Mile High Flood District's Urban Storm Drainage Criteria Manual Vol 3 directs that when straw bales are used in series as a barrier, the end of each bale shall be tightly abutting one another. Two wooden stakes shall be used to hold each bale in place. Wooden stakes shall be driven six inches into the ground.
   - Location: Eastern sediment pond
   - Pollutant Source: Sediment from disturbed areas
   - Down Gradient Control Measures: Additional control measures (14 inch grade differential at pond outlet) were implemented down gradient of this location. However, these controls were implemented as part of a treatment train, dependent on the inadequate control measure in this finding. As a result, the system of control measures was inadequate to manage pollutant contribution from the above pollutant source.
   - Result: There was a potential discharge of pollutants to a water of the state as identified in Note 6, drainage path D.

CONCLUSION

The division expects the permittee to design and implement control measures as required by the permit and make the following corrections:

- The permittee shall at all times properly operate and maintain all facilities and systems of treatment and control which are installed or used by the permittee as necessary to achieve compliance with the conditions of the permit.
- The permittee must minimize the exposure of pollutant sources associated with manufacturing, processing, and material storage areas to rain, snow, snowmelt, and runoff.
- The permittee must eliminate non-stormwater discharges not authorized by this or any other CDPS permit, or conducted in accordance with a Division Low Risk Guidance document, or must apply for a modification for discharge of process water.
- All control measures used by the permittee to meet the effluent limitations contained in this permit must be selected, designed, installed, implemented, and maintained in accordance with good engineering, hydrologic and pollution control practices.
- The permittee must develop, implement, and maintain a stormwater management plan for each facility authorized by the permit.

Sand and Gravel Inspection Report Photograph Log

Facility: Gillette Sand and Gravel Permit: COG501770 Date: 11/06/2019

Photograph: 1 - A portion of the berm adjacent to the small tributary stream was approximately one foot tall, and there was a gap in a section of the berm

Photograph: 2 - Control measures were not implemented to manage runoff from sediment pushed over the berm during snow plowing operations

Sand and Gravel Inspection Report Photograph Log

Facility: Gillette Sand and Gravel Permit: COG501770 Date: 11/06/2019

Photograph: 3 - Berm was not compacted

Photograph: 4 - Berm was not compacted

Facility: Gillette Sand and Gravel Permit: COG501770 Date: 11/06/2019

Photograph: 5 - Berm was not compacted

Photograph: 6 - Hay bales were not tightly adjoined, and bales were not staked into the ground

Facility: Gillette Sand and Gravel Permit: COG501770 Date: 11/06/2019

Photograph: 7 - Hay bales were not staked into the ground

Photograph: 8 - Mining area discharging to the eastern sediment pond

Facility: Gillette Sand and Gravel Permit: COG501770 Date: 11/06/2019

Photograph: 9 - Mining area discharging to the eastern sediment pond

Photograph: 10 - Eastern sediment pond outlet structure

Facility: Gillette Sand and Gravel Permit: COG501770 Date: 11/06/2019

Photograph: 11 - Outfall from eastern sediment pond

Photograph: 12 - Small tributary stream with wetlands and beaver dams that receives discharge from the eastern sediment pond