
North Coast Regional Water Quality Control Board

INSPECTION MEMO

Name and Location of Facility Inspected

Eagle Rock, Inc. - La Grange Pit
40029 La Grange Road
Junction City, Trinity County

Industrial General Permit

WDID #: 1 53I000476

Inspection Date

February 9, 2023

Inspection Time

10:00 am to 2:30 pm

Inspector Name & Affiliation

Farzad Kasmaei, North Coast Regional Water Quality Control Board (NCRWQCB)
Amanda Piscitelli, NCRWQCB
Stephen Ryan, U.S. Army Corps of Engineers (USACE)
Kody Shellhouse, BLM

Names & Titles of Site Representative

Dustin Tillinghast, Facility's Manager, ERI

Consent for inspection Provided?

Yes, by Dustin Tillinghast

Notified of Inspection?

Yes, Dustin Tillinghast was notified.

Weather Conditions at the Time of the Inspection: Dry weather

Facility Receiving Water Name(s): Oregon Gulch & Poison Gulch, Tributaries to Trinity River

Inspection Memo Prepared By: Farzad Kasmaei

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A. Background

The Eagle Rock Inc. (Discharger) La Grange Pit, according to Stormwater Multiple Application and Report Tracking System (SMARTS), is a 240-acre mining facility (Facility) located at 40029 La Grange Road near Junction City. The Facility is currently under the Surface Mining and Reclamation Act (SMARA) that is regulated by Trinity County as an active mining site. The site is currently under the National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Industrial Activities NPDES Order CAS00001 and State Water Resources Control Board Order 2014-0057-DWQ (Industrial General Permit) WDID No. 1 531000476.

The industrial activities associated with this mining operation include excavation, crushing, screening, washing, and stockpiling. Also, there are concrete and asphalt hot mix plants both located at the western portion of the Facility.

The Facility was previously inspected by Regional Water Board staff on September 28, 2021, and observed several violations including the installation of large berms in Oregon Gulch within the adjacent property (BLM). Per the staff direction, the Discharger revised the SWPPP and site map and addressed a few BMP deficiencies that were observed during the inspection. On August 25, 2022, a follow up inspection was conducted for the site reevaluation. Significant number of uncovered fine stockpiles were observed adjacent to Oregon Gulch. Also, no sediment and erosion control BMPs were observed to protect this seasonal Creek. As a result, an emergency Cleanup and Abatement Order (CAO) was issued directing the Discharger to conduct a site evaluation, prepare and implement an Interim Cleanup and Stabilization Plan (ICSP). On February 16, 2023, the ICSP completion report was submitted.

B. Inspection Narrative and Findings

On February 9, 2023, Regional Water Board staff, in the company of staff from USACE, inspected the Facility to evaluate whether the Facility is in compliance with the CAO and other applicable permit requirements. Also, Mr. Kody Shellhouse, BLM representative, was present on-site to discuss and inspect the installed large berms within the BLM property in Oregon Gulch.

The inspection group inspected two discharge points, DP-3 and DP-4, located at the southwest corner of the facility where the facility's runoff discharge to Oregon Gulch (Pictures 1 and 2). Per the sampling reports that were recently reported via Stormwater Multiple Application and Tracking System (SMARTS), high concentration of TSS and Iron were detected in Facility's runoff. Also, Mr. Tillinghast confirmed that the highly turbid runoff was observed at these Discharge points during the previous sampling events. As a result, the Discharger is required to install additional effective BMPs to avoid further exceedances in future. The large berms in Oregon Gulch were inspected and the inspection group discussed the property line in that area (Picture 3). Large

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berms have been installed years ago by Facility staff without obtaining any applicable permits from 401 unit, CDFW or USACE.

The inspection group inspected the fill area adjacent to Poison Gulch. Per Mr. Tillinghast explanation, no industrial activities are performed and no industrial materials/equipment will be stored within this area. Therefore, this area is considered as a non-industrial area (Picture 4).

After inspecting offsite pond area approximately half a mile away from the facility to the west, stockpile area was inspected. Netting was installed and BFM were applied to stabilize the creek slope areas in vicinity of stockpile area. Also, the newly constructed berm and access road were inspected to ensure that the CAO requirements had been met (Pictures 5, 6a, 6b and 7).

The roofed fueling storage area/repair shop was inspected. Significant spills were observed during the last inspection. However, this area has been maintained by Discharger's contractor. No spill was observed on the ground (Picture 8).

Lastly, both concrete wastewater ponds were inspected (Picture 9). The Discharger is still utilizing these unlined ponds to infiltrate the concrete wastewater. The Regional Water Board has previously informed the Discharger that such infiltration BMPs/ponds can be used to infiltrate stormwater runoff only. Infiltrating the wastewater can pose a threat to groundwater quality. No groundwater monitoring and sampling have been previously conducted by Discharger.

C. Conclusion

The Discharger is currently utilizing unlined ponds to infiltrate the concrete wastewater. Per the sampling reports submitted via SMARTS, high concentration of TSS and Iron have been detected in facility's runoff at discharge points (DP-3 and DP-4). The Discharger must reevaluate the facility to ensure adequate/effective BMPs including sediment and erosion control BMPs are in place to avoid further exceedances in future. Per Mr. Tillinghast, the site map will be updated to include the drainage areas.

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Attachment(s):

1. Pictures

Pictures:



Picture 1- View of discharge point (DP-3) located at southwest corner of the facility. Existing settling pond is shown on the top left corner of the picture adjacent to DP-3. Picture taken by Farzad Kasmaei.

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Picture 2- View of sediment traps in vicinity of the discharge point (DP-4) located at southeast corner of the existing concrete ready mix. Picture taken by Farzad Kasmaei.



Picture 3- View of large berms that were installed by Facility staff in Oregon Gulch on the south side of the facility. Picture taken by Farzad Kasmaei.

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Picture 4- Looking southwest at fill area located on the north side of the facility in vicinity of Poison Gulch. Picture taken by Farzad Kasmaei.



Picture 5 - Looking west at the office area berm that has been stabilized temporarily with BFM materials in accordance with the CAO requirements. Picture taken by Farzad Kasmaei.

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Pictures 6a, 6b – View of the erodible creek slope stabilized with BFM and netting in accordance with the CAO requirements. Picture taken by Farzad Kasmaei.



Picture 7 – Looking west at stabilized area adjacent to Oregon Gulch. This area has been recently improved in accordance with emergency CAO. The newly constructed access road, installed berm and netting are shown on the picture. Picture taken by Farzad Kasmaei.

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Picture 8 - View of the fueling storage area that was maintained. Significant improvements made to this area since last inspection and no spills were observed on the ground. Picture taken by Farzad Kasmaei.

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Picture 9- Looking east at couple of unlined concrete wastewater ponds on the west side of the facility. Picture taken by Farzad Kasmaei.