

Stormwater Pollution Prevention Plan (SWPPP)

for

Bovill Kaolin Project

Phase 1 Activity

Bovill, Idaho

Operator(s)

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SECTION 1: FACILITY DESCRIPTION AND CONTACT INFORMATION

1.1 Facility Information

Facility Information

Facility Name: I-Minerals Bovill Kaolin Project, Mineral Lease #9276

Street/Location: Mineral Lease Site #9276; Moose Creek Road

City: Bovill

State: ID

ZIP Code: 83806

County or Similar Government Subdivision: Latah County

NPDES ID (i.e., permit tracking number): : IDRO5CU73 (if covered under a previous permit)

Primary Industrial Activity SIC code, and Sector and Subsector (2021 MSGP, Appendix D and Part 8): 1455 Kaolin and Ball Clay (refer to Appendix N of the 2021 MSGP)

Co-located Industrial Activity(s) SIC code(s), Sector(s) and Subsector(s) (2021 MSGP, Appendix D): Sector J3: Mineral Mining and Dressing / Clay, Ceramic, and Refractory Materials

Is your facility presently inactive and unstaffed and are there no industrial materials or activities exposed to stormwater? ☐ Yes ☒ No

Latitude/Longitude

Latitude:

46.88824 ° N (decimal degrees)

Longitude:

-116.4725 ° W (decimal degrees)

Method for determining latitude/longitude (check one):

☒ Maps (If USGS topographic map used, specify scale: _____)

☒ GPS

☐ Other (please specify): _____

Horizontal Reference Datum (check one):

☐ NAD 27

☒ NAD 83

☐ WGS 84

Is the facility located in Indian country? ☐ Yes ☒ No

If yes, provide the name of the Indian tribe associated with the area of Indian country (including name of Indian reservation, if applicable). _____

Are you considered a "federal operator" of the facility?

Federal Operator – an entity that meets the definition of "operator" in [the 2021 MSGP] and is either any department, agency or instrumentality of the executive, legislative, and judicial branches of the Federal government of the United States, or another entity, such as a private contractor, operating for any such department, agency, or instrumentality.

☐ Yes ☒ No

Estimated area of industrial activity at your facility exposed to stormwater: 16.0 acres
(to the nearest quarter acre)

Discharge Information

Does this facility discharge stormwater into a municipal separate storm sewer system (MS4)?

☐ Yes ☒ No

If yes, name of MS4 operator: _____

Name(s) of surface water(s) that receive stormwater from your facility: See Section 1.4.5 of this SWPPP

Does this facility discharge industrial stormwater directly into any segment of an “impaired water”
(see definition in 2021 MSGP, Appendix A)? ☐ Yes ☒ No

If Yes, identify name of the impaired water(s) (and segment(s), if applicable):

Identify the pollutant(s) causing the impairment(s):

Which of the identified pollutants may be present in industrial stormwater discharges from this facility?

Has a Total Maximum Daily Load (TMDL) been completed for any of the identified pollutants?
If yes, please list the TMDL pollutants:

Does this facility discharge industrial stormwater into a receiving water designated as a Tier 2, Tier 2.5 or Tier 3 water (see definitions in 2021 MSGP, Appendix A)? ☐ Yes ☒ No

Are any of your stormwater discharges subject to effluent limitation guidelines (ELGs) (2021 MSGP Table 1-1)? ☐ Yes ☒ No

If Yes, which guidelines apply?

1.2 Contact Information/Responsible Parties

Facility Operator (s):

Name: I-Minerals USA, Inc.
Address: 13403 N. Government Way, Suite 102
City, State, Zip Code: Hayden, Idaho, 83835
Telephone Number: (877) 234-1950
Email address: jwold@imineralsinc.com

Facility Owner (s):

Name: I-Minerals USA, Inc.
Address: 13403 N. Government Way, Suite 102
City, State, Zip Code: Hayden, Idaho, 83835
Telephone Number: (208) 598-8629
Name: I-Minerals, USA

SWPPP Contact:

Primary:

Name: Jamie Wold, Project Manager
Telephone number: (208) 598-8629
Email address: jwold@imineralsinc.com

Backup:

Name: Lamar Long, Engineer
Telephone number: (208) 773-8984
Email Address: allamar@imineralsinc.com

1.3 Stormwater Pollution Prevention Team

The Stormwater Pollution Prevention Team is responsible for assisting the project manager in developing and revising the facility's Stormwater Pollution Prevention Plan (SWPPP) as well as maintaining control measures and taking corrective actions where required. Each member of the Stormwater Pollution Prevention Team must have ready access to either an electronic or paper copy of applicable portions of the Multi-Sector General Permit (MSGP) and the SWPPP. **Table 1-1** summarizes the stormwater prevention team.

Table 1-1. Stormwater Management Team

Staff Names	Position
Jamie Wold, Project Manager	Authorized signatory authority for Notice of Intent (NOI), SWPPP certification, and future annual reports. Responsible for overall operations and seeing that the SWPPP and MSGP are implemented.
On-Site Personnel (equipment operators, contractors)*	Ensure provisions of the SWPPP and MSGP are carried out. Conducts periodic inspections, implements stormwater management controls, yearly inspections, and maintenance of control structures. Schedules repairs and routine maintenance. Responsible for sample collection, if required.

1.4 Site Description (MSGP 6.2.2)

HDR Engineering, Inc. (HDR), under contract with I-Minerals, USA (I-Minerals), has updated this stormwater pollution prevention plan (SWPPP) to reflect the requirements in the 2021 Multi-Sector General Permit for Stormwater Discharges Associated with Industrial Activities (MSGP). The SWPPP is updated for I-Minerals' Bovill Kaolin Project (Project) Phase 1 activities. I-Minerals has been operating this facility under the 2015 MSGP. The U.S. Environmental Protection Agency's (USEPA) re-issued the MSGP on January 15, 2021, with the 2021 MSGP becoming effective on March 1, 2021 (replacing the 2015 MSGP). A notice of intent (NOI) and updated SWPPP must be completed no later than May 30, 2021.

Mining reclaimed tailings consists of excavating the sand (K-spar and quartz) portion of the WBL tailings pile. The clay portion of the tailings (at the easternmost downslope end of the tailings) will not be mined under the state-approved plan of operations. The previous lessee piled the tailings on a gently sloped hill with a toe berm height of approximately 20 feet. The upper sloped portion of the impoundment is comprised of mostly sand and silty-sand sized materials; the lower (east end) flat portion is primarily comprised of clay and silty-clay sized materials. The tailings on-average is approximately 17 feet thick. A small topographic island is located within the tailings and this area will not be disturbed during mining activities.

The total surface area to be excavated of sand tailings is approximately 425,150 square feet (approximately 9.8 acres), representing an approximate volume of 7,227,550 cubic feet, or approximately 401,530 tons of material. Proposed mining activities would occur intermittently from June through October over a 10-year period. Annual tailings removal would generally be up to 50,000 tons per year (approximately 1.2 acres per year).

The tailings pile is excavated using a loader and/or excavator or backhoe. The aerial extent of excavation for each season depends upon the demand for tailings material with the goal to limit the amount of unvegetated (disturbed) ground at any one time. As a first step, the area to be excavated is grubbed. The vegetation is stockpiled nearby (on leased land) and generally is worked back into the disturbed area as part of reclamation. Following grubbing, the designated area is excavated. The depth of excavation is limited to the depth of tailings, which is approximately 17 feet, on average. In general, the excavation side walls are sloped to allow safe ingress and egress for equipment (e.g., front-end loader) and personnel. The excavated tailings are excavated and transported off site or, if wet, the screened tailings are spread out on the ground surface and allowed to dry. Drying tailings occurs adjacent to or within the excavated area and are within the Lease 9276. The tailings are loaded into dump trucks using a front-end loader or excavator and hauled off site for processing to recover K-spar and quartz.

Prior to surface disturbance, the area to be mined is staked on the ground to allow the Idaho Department of Lands (IDL) to assess the timber for possible sale. During mining activities, I-Minerals follows applicable sections of the *Best Management Practices for Mining in Idaho* (IDL 1992), including best management practices (BMPs) to control runoff from unvegetated areas (e.g., straw bale barriers and silt fences). In addition, stormwater is managed in accordance with the Multi-Sector General Permit for Industrial Facilities (MSGP) for Sector J – Non-Metallic Mineral Mining and Dressing.

During mining activities, signs are posted on Moose Creek Road at both ends of the project area warning travelers of excavation activities and heavy equipment operations. Moose Creek Road through the project area is built on tailings material.

The mining sequence started excavation activities in the southwest portion of the tailings and mine toward the north. Given that typical mining activities would be approximately 1.2 acres per year, excavation would eventually approach the road (approximately in year 5 of mining, assuming 1.2 acres per year). The road is constructed on tailings. At this point, a temporary road will be built to the south of the original road to route traffic through the area, so that the tailings beneath the road could be removed. The current road base (rock basalt) would be stockpiled and reused in reconstructing the road in its original footprint. The road would be re-constructed to the same pre-mine quality. Appropriate road construction and closure BMPs identified in the *Best Management Practices for Mining in Idaho* (IDL 1992) and *Forestry BMPs in Idaho* (University of Idaho 2021) will be followed, including drainage and sediment control systems.

The Standard Industrial Classification (SIC) of the facility is 1455 – Kaolin and Ball Clay. Under the MSGP, the facility is subject to Subsector J3: Clay, Ceramic, and Refractory Materials.

1.5 General Location Map (MSGP 6.2.2.2)

The general location map for the project is found in **Figure 1**.

1.6 Site Map (MSGP 6.2.2.3)

Figure 2 illustrates the major components of the facility, including requirements per MSGP 8.J.6.2, as applicable. **Figure 3** illustrates how typical BMPs such as silt fences and straw bale barriers are used.

1.7 2021 MSGP Sector J – Non-Metallic Mineral Mining (MSGP 8.J.1)

This SWPPP covers activities associated with the Sector J – Non-Metallic Mineral Mining and Dressing, J3 Clay, Ceramic, and Refractory Materials. Per Part 8 Subpart J of the 2021 MSGP, the activities associated with the Project are considered “active mining.” No “earth disturbing activities conducted prior to active mining activities” (defined in MSGP 8.J.3.2) are anticipated as part of Phase 1 activities under the 2021 MSGP. Anticipated active mining activities include the following:

- Extraction of non-metallic minerals
- Reclamation

No access roads, or construction of facilities are anticipated.

1.8 Site Climate

The I-Minerals WBL tailings facility is in north-central Idaho. According to the Western Regional Climate Center, nearby Deary experiences an average annual precipitation of 36.06 inches, with January being the wettest month.

1.9 303(d) Listed Streams

The Project is located near an ephemeral stream that feeds into Moose Creek. Idaho Department of Environmental Quality (IDEQ) mapping shows this ephemeral stream is part of Moose Creek. Moose Creek is listed in the Potlatch River Total Maximum Daily Load (TMDL) with the identification code of ID17060306CL053_02 and is impaired for *Escherichia coli* (*E. coli*) and temperature.

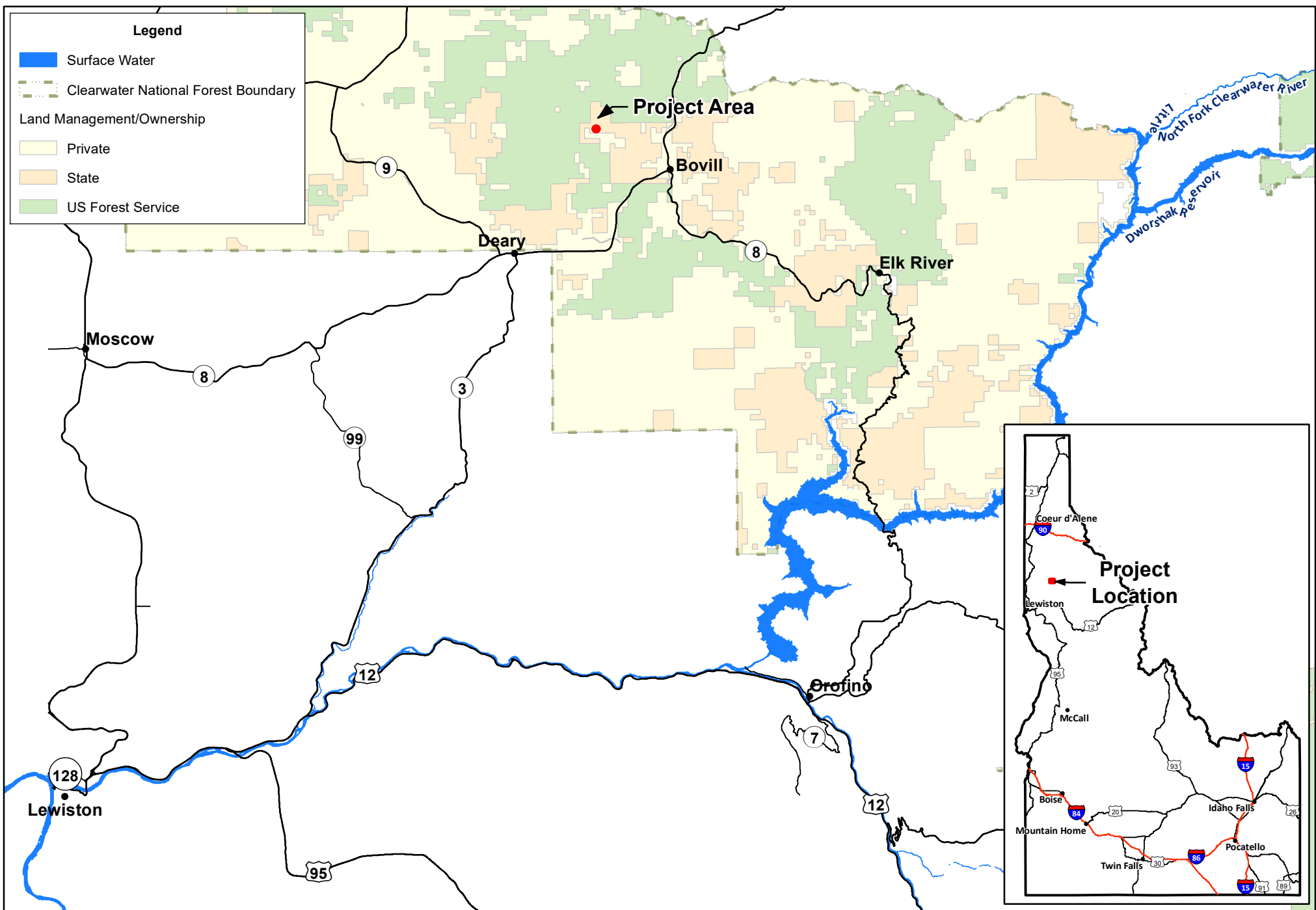


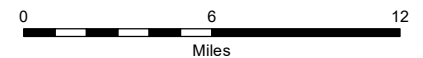
Figure 1. Project Location Map
I-Minerals USA Inc., Bovill Kaolin Project,
Latah County, ID



Data Sources: State of Idaho Geospatial Clearinghouse (INSIDE Idaho);
 Clearwater National Forest; BLM; USGS; I-Minerals

Map Production Date: 5/13/2021

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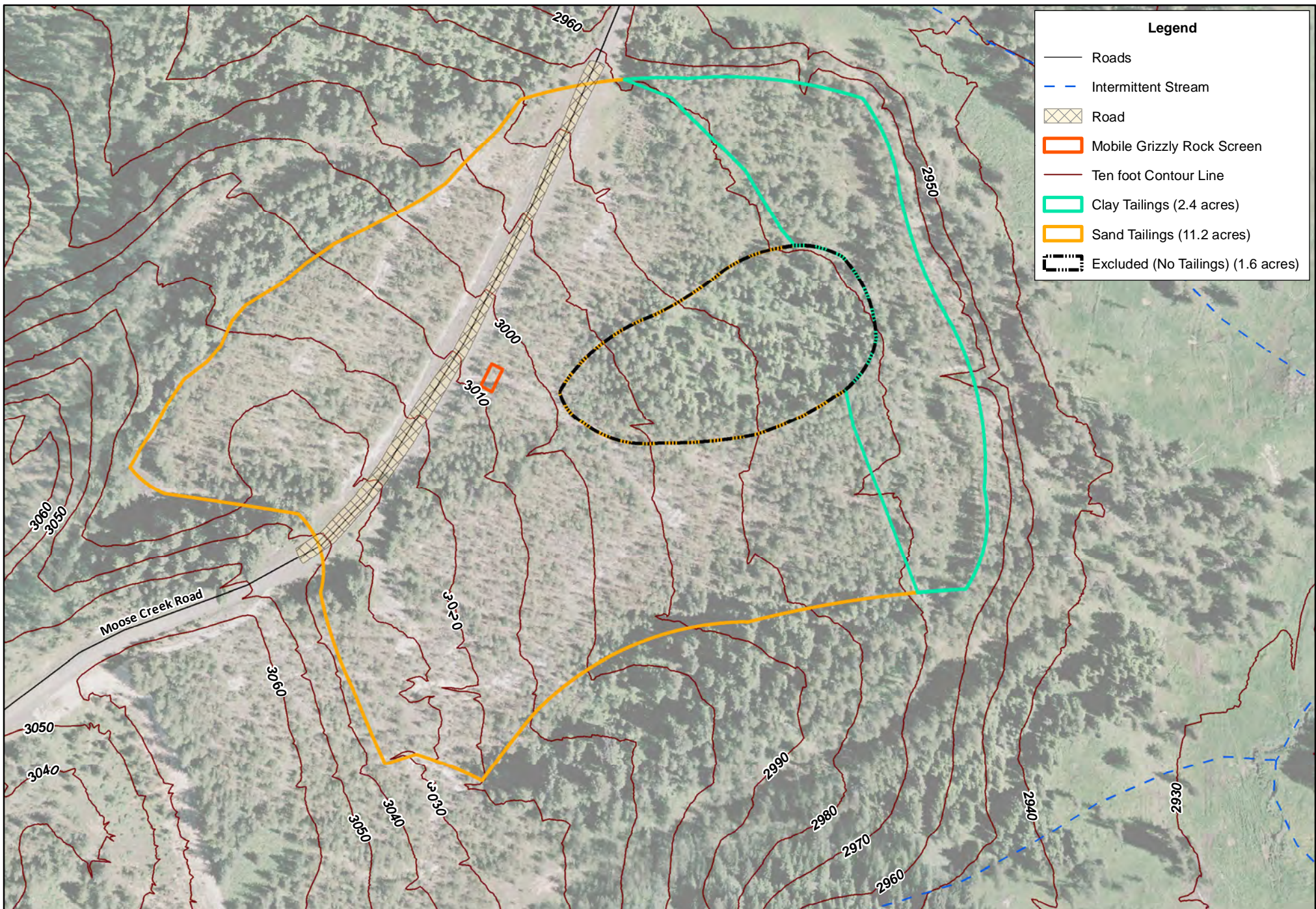


Figure 2. Phase 1 Facility
I-Minerals USA Inc., Bovill Kaolin Project,
Latah County, ID

Imagery: 2015 NAIP, 1 meter resolution
 Source: NRCS/USDA Digital Gateway
 Other Data Sources: State of Idaho Geospatial
 Clearinghouse (INSIDE Idaho); Clearwater
 National Forest; BLM; USGS; I-Minerals



Map Production Date: 5/13/2021
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 Feet

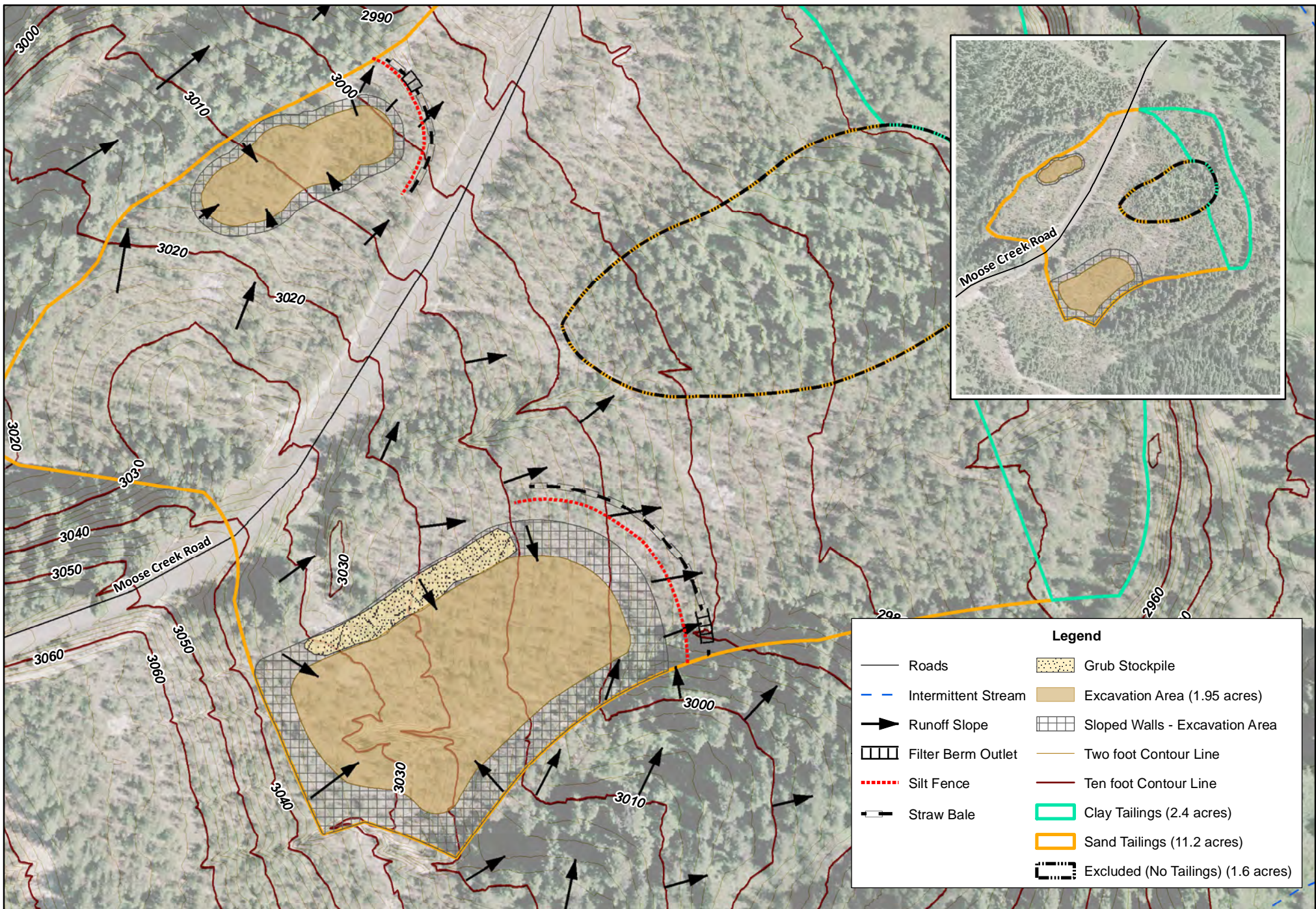


Figure 3. Typical Tailings Excavation Stormwater/Drainage Control Plan

Imagery: 2015 NAIP, 1 meter resolution
 Source: NRCS/USDA Digital Gateway
 Other Data Sources: State of Idaho Geospatial
 Clearinghouse (INSIDE Idaho); Clearwater
 National Forest; BLM; USGS; I-Minerals



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 Feet

SECTION 2: POTENTIAL POLLUTANT SOURCES

2.1 Industrial Activity and Associated Pollutants (MSGP 6.2.3.1 and 6.2.3.2)

The following industrial activities take place at the facility:

- Tailings excavation and hauling
- Vegetation stockpiling
- Tailings spreading for drying (if needed)
- Operation of heavy equipment
 - A front-end loader on a flat bed trailer pulled by a truck
 - A backhoe or excavator on a flat bed trailer pulled by a truck
 - Haul trucks (12-yard dump trucks, some equipped with pup trailers)
- Fuel delivery via pickup truck fuel transfer tanks
- Temporary fuel storage (if necessary)
- Site preparation for stabilization
- Seeding and fertilization of reclamation areas

Generally, personnel on site consist of two people. One person runs the loader to excavate, dry, and load the tailings. An additional person drives the dump truck to haul the tailings off site for further processing. Excavated materials are temporarily stored on site and exposed to stormwater. Potential pollutants associated with these earth moving activities generally include dust, total suspended solids (TSS), total dissolved solids (TDS), and turbidity.

Operations occur during the non-winter season (approximately June through October). On-site power, if necessary, is supplied by a diesel- or gasoline-powered generator. Fuel is delivered as needed via pickup truck fuel transfer tanks (typically 90 to 150 gallons). If fuel is temporarily stored on site, secondary containment will be used (either double-walled tanks or a secondary containment wall). If fuel storage volume exceeds 1,320 gallons (not anticipated), a Spill Prevention, Control, and Countermeasure (SPCC) Plan will be prepared in accordance with Title 40, Part 112 of the Code of Federal Regulations (40 CFR 112).

No permanent structures are erected on site, but a trailer may be brought onto the site to store materials and serve as an on-site office. Workers on site are provided a portable toilet that is transported, positioned, and maintained by a local, licensed sanitation service. Potential pollutants associated with these administrative activities include dust and diesel or gasoline fuel.

Site preparation activities are conducted for land reclamation and may include the application of fertilizers. Potential pollutants associated with these reclamation activities include dust, TSS, TDS, turbidity, nitrogen, and phosphorus. Following excavation, contoured and graded areas are scarified to prepare the medium for seeding and planting. Scarification could include ripping, disking, or otherwise roughing the surface for seed bed and planting preparation. After scarification, graded and contoured areas are seeded with grasses and legumes or lodgepole pine. Mulch (certified weed-free straw) is applied to the growth medium to reduce erosion, promote stabilization, and enhance seed germination. Fertilizers are only applied if soils are deficient in nutrients. No irrigation is proposed.

Solid waste generated at the site is expected to be minimal and is containerized and hauled off site for proper disposal.

Drainage at the site is toward the east with the sand tailings area on an approximately 5 to 15 percent slope, while the clay tailings area is nearly flat. During mining activities, BMPs are implemented to control runoff from unvegetated areas (i.e., straw bale barriers and silt fences). Stormwater discharge would occur via sheet flow at the intermittent stream east of the site (**Figure 2** and **Figure 3**).

Based on previous chemical and mineralogical data of ore and waste rock in the Kelley Basin area, including materials similar to those extracted from the project site, the acid or alkaline generation capacity from the tailings is extremely low to non-existent. The absence of sulfides in the tailings indicates that there would be no oxidation of sulfides; therefore, no acidification of runoff water. In addition, geochemical analyses on nearby ores demonstrate little to no leaching hazard under normal environmental circumstances.

Table 2-1 identifies potential sources of pollution associated with exploration activities for the Project.

Table 2-1, Industrial Activity and Associated Pollutants

Industrial Activity	Associated Pollutants
Tailings excavation and hauling	Dust, TSS, TDS, Turbidity
Vegetation stockpiling	Dust, TSS, TDS, Turbidity
Tailings spreading for drying (if needed)	Dust, TSS, TDS, Turbidity
Operation of heavy equipment (loader, 30-ton dump truck)	Dust, TSS, TDS, Turbidity
Fuel delivery for diesel generator (if necessary)	Dust, Diesel
Site preparation for stabilization	Dust, TSS, TDS, Turbidity
Seeding and fertilization of reclamation areas	Nitrogen, Phosphorus

TSS = total suspended solids; TDS = total dissolved solids

2.2 Spills and Leaks (MSGP 6.2.3.3)

Potential spills and leaks could occur from heavy equipment, fuel delivery, and temporary fuel and/or fertilizer storage (if necessary). The entire working area drains toward an intermittent stream to the east, which is the surface water that could potentially be affected by a spill or release carried by stormwater runoff if appropriate BMPs were not implemented. **Table 2-2** and **Table 2-3** summarize areas where spills could occur and a description of past spills, respectively.

Table 2-2 . Areas of Site Where Potential Spill/Leaks Could Occur

Location	Discharge Points
Excavation areas, staging areas, and loading areas (basically the entire mine site)	See Note 1 below

Note 1: The 2021 MSGP defines *discharge point* as the location where collected and concentrated stormwater flows are discharged from the facility such that the first receiving water body into which the discharge flows, either directly or through a separate storm sewer system, is a water of the U.S. No stormwater discharge points have been identified as part of the Project. Rather the potential for a stormwater entering a water of the U.S. is through sheet flow to the intermittent stream east of the site. This intermittent stream discharges into Moose Creek, which is a listed 303(d) stream and has a total maximum daily load (TMDL) for E. coli and temperature (ID17060306CL053_03).

Table 2-3. Description of Past Spill/Leaks

Date	Description	Discharge Points
	None reported as part of this operation.	

2.3 Unauthorized Non-Stormwater Discharges Documentation (MSGP 6.2.3.4)

A non-stormwater discharge is any discharge from the facility that is not composed entirely of rainfall or snowmelt runoff. Allowable non-stormwater discharges include the following (MSGP 1.2.2.1):

- Discharges from emergency/unplanned fire-fighting activities;
- Fire hydrant flushings;
- Potable water, including water line flushings;
- Uncontaminated condensate from air conditioners, coolers/chillers, and other compressors and from the outside storage of refrigerated gases or liquids;
- Irrigation drainage;
- Landscape watering provided all pesticides, herbicides, and fertilizers have been applied in accordance with the approved labeling;
- Pavement wash waters where no detergents or hazardous cleaning products are used (e.g., bleach, hydrofluoric acid, muriatic acid, sodium hydroxide, nonylphenols), and the wash waters do not come into contact with oil and grease deposits, sources of pollutants associated with industrial activities (see Part 5.2.3), or any other toxic or hazardous materials, unless residues are first cleaned up using dry clean-up methods (e.g., applying absorbent materials and sweeping, using hydrophobic mops/rags) and appropriate control measures have been implemented to minimize discharges of mobilized solids and other pollutants (e.g., filtration, detention; settlement);
- Routine external building washdown/power wash water that does not use detergents or hazardous cleaning products (e.g., those containing bleach, hydrofluoric acid, muriatic acid, sodium hydroxide, nonylphenols);
- Uncontaminated ground water or spring water;
- Foundation or footing drains where flows are not contaminated with process materials; and

- Incidental windblown mist from cooling towers that collects on rooftops or adjacent portions of your facility, but not intentional discharges from the cooling tower (e.g., “piped” cooling tower blowdown; drains).

An updated evaluation for non-stormwater discharges was conducted on May 3, 2021. A summary of this evaluation is as follows:

- Date of evaluation: May 3, 2021
- Description of the evaluation criteria used: Site inspection and interviews with site personnel.
- List of the outfalls or onsite drainage points that were directly observed during the evaluation:
 - No outfalls for this site, downgradient drainage was inspected.
- Allowable non-stormwater discharges observed at the facility:
 - None observed May 3, 2021.
- Unauthorized non-stormwater discharges observed at the facility:
 - None observed May 3, 2021.

2.4 Salt Storage (MSGP 6.2.3.5)

Salt is not used at the facility; therefore, salt storage is not applicable.

2.5 Sampling Data Summary (MSGP 6.2.3.6)

No stormwater samples were required nor collected as per the previous permit term (2015 MSGP).

SECTION 3: STORMWATER CONTROL MEASURES

Control measures are the BMPs or other structural or non-structural practices that are used to prevent or reduce the discharge of pollutants in stormwater. BMPs must be properly selected, installed, and maintained in accordance with the manufacturer's specifications and good engineering practices. If periodic inspections or other information indicates a practice has been inappropriately or incorrectly installed, the permittee must modify or replace the control. BMPs are maintained throughout the season, including conducting inspections and repairs prior to seasonal closures or periods of inactivity.

Non-numerical technology-based effluent limits include the following:

- Minimize exposure
- Good housekeeping
- Maintenance
- Spill prevention and response
- Erosion and sediment controls
- Management of runoff
- Salt storage piles
- Dust generation and vehicle tracking of industrial materials

3.1 Non-numeric Technology-based Effluent Limits (BPT/BAT/BCT)

MSGP 2.1.2.1 requirements to minimize exposure:

- Use grading, berming, or curbing to prevent runoff of contaminated flows and divert run-on away from these areas;
- Locate materials, equipment, and activities so that potential leaks and spills are contained or able to be contained or diverted before discharge;
- Clean up spills and leaks promptly using dry methods (e.g., absorbents) to prevent the discharge of pollutants;
- Store leaky vehicles and equipment indoors or, if stored outdoors, use drip pans and absorbents;
- Use spill/overflow protection equipment;
- Perform all vehicle and/or equipment cleaning operations indoors, under cover, or in bermed areas that prevent runoff and run-on and also that capture any overspray; and
- Drain fluids from equipment and vehicles that will be decommissioned, and, for any equipment and vehicles that will remain unused for extended periods of time, inspect at least monthly for leaks.

3.1.1 Minimize Exposure (MSGP 2.1.2.1)

Where feasible, minimizing exposure of potential pollutant sources to precipitation is an important control option. Minimizing exposure prevents pollutants, including debris, from coming into contact with precipitation and can reduce the need for BMPs to treat contaminated stormwater runoff. It can also prevent debris from being picked up by stormwater and carried into drains and surface waters.

Steps that the I-Minerals Bovill Kaolin facility has undertaken to minimize exposure of industrial activities to stormwater include the following:

- Grading, berming, silt fencing, or similar measures are used to prevent runoff of contaminated flows and divert run-on away from these areas.
- Equipment maintenance and repair are performed off site when possible. If emergency maintenance is required on site, activities are conducted such that contaminated flows would be diverted away from surface waters.
- Spill kits are located on the heavy equipment (loader and dump trucks). Drip pans, absorbents, or other containments are used to capture leaks. Leaks are promptly repaired.
- When excavating, vegetation is spared as much as possible and seeding is conducted, as necessary, to minimize exposed soils.
- Stockpiles (i.e., vegetation, etc.) are located away from surface waters and geologically unstable areas.

Table 3-1 lists BMP options to minimize disturbed areas. In addition to those practices described above, use of these BMPs may also be appropriate during excavation to minimize the exposure of sediment to stormwater. Reference to BMP catalog is located in Appendix A of this report.

Table 3-1. BMP Options to Minimize Disturbed Area

Best Management Practice	BMP Information Sheet No.
Timing of Construction	IDL BMP I.9
Limited Surface Distance	IDL BMP I.10
Erosion Prevention on Temporary and Private Roads	IDEQ BMP 41, 42, 85

Source: IDL = Idaho Department of Lands. Best Management Practices for Mining in Idaho, 1992. IDEQ – Idaho Department of Environmental Quality, Idaho Catalog of Stormwater Best Management Practices, April 2020.

3.1.2 Good Housekeeping (MSGP 2.1.2.2 and 6.2.5.1.a)

MSGP 2.1.2.2 requirements for good housekeeping:

- Sweep or vacuum at regular intervals or, alternatively, wash down the area and collect and/or treat, and properly dispose of the washdown water;
- Store materials in appropriate containers;
- Keep all dumpster lids closed when not in use. For dumpsters and roll off boxes that do not have lids and could leak, ensure that discharges have a control (e.g., secondary containment, treatment). The permit does not authorize dry weather discharges from dumpsters or roll off boxes;
- Minimize the potential for waste, garbage and floatable debris to be discharged by keeping exposed areas free of such materials, or by intercepting them before they are discharged.

I-Minerals is committed to maintaining a clean project site, including keeping the site free of waste material and minimizing exposure of litter, debris, and chemicals to stormwater. The following actions are taken on site to prevent stormwater from coming in contact with pollutants:

- Personnel familiar with and trained in stormwater management are on site during normal operating hours and watch for leaks from equipment or other conditions that could contribute to stormwater impacts.
- Trained personnel conduct routine inspections of stormwater drainage systems, including BMPs associated with excavation areas and stockpile areas.
- Materials are stored in an orderly and appropriate manner and labeled as necessary.
- Solid and municipal wastes are collected and hauled off site for appropriate disposal at least weekly and more frequently as needed.
- On-site sanitary waste is managed with a portable toilet that is serviced regularly.
- General cleanliness at the site is maintained by onsite personnel.

Good housekeeping practices are practiced regularly on site, and BMP inspections will occur according to the schedule described in Sections 4 and 5 of this SWPPP. **Table 3-2** lists BMP options for good housekeeping. These general good housekeeping BMPs may be appropriate for use throughout the site.

Table 3-2. BMP Options for Good Housekeeping

Best Management Practice	BMP Information Sheet No.
Dust Control	IDEQ BMP 43
Stockpile Management	IDEQ BMP 44
Spill Prevention and Control	IDEQ BMP 46
Waste Management	IDEQ BMP 51
Sanitary/Septic Waste Management	IDEQ BMP 50

Source: IDL = Idaho Department of Lands. Best Management Practices for Mining in Idaho, 1992. IDEQ – Idaho Department of Environmental Quality, Idaho Catalog of Stormwater Best Management Practices, April 2020.

3.1.3 Maintenance (MSGP 2.1.2.3 and 6.2.5.1.b)

MSGP 2.1.2.3 requirements for maintenance:

- Performing inspections and preventive maintenance of stormwater drainage, source controls, treatment systems, and plant equipment and systems that could fail and result in contamination of stormwater.
- Maintaining non-structural control measures (e.g., keep spill response supplies available, personnel appropriately trained).
- Cleaning catch basins when the depth of debris reaches two-thirds (2/3) of the sump depth and keeping the debris surface at least six inches below the lowest outlet pipe.

Stormwater pollution could potentially occur from fuel, oils, or other chemicals leaking from equipment at the facility. Equipment is generally kept in good operating condition. While full equipment maintenance capabilities are not planned for the site, if emergency repairs or maintenance is needed (i.e., should a hydraulic hose rupture during work), maintenance is performed. In such situations, drip pans, berms, or secondary containments are used to contain pollutants and avoid contaminating runoff.

Another potential exposure of pollutants to stormwater would be from stockpiles of vegetation and other excavated materials. I-Minerals maintains these piles at slopes that help to minimize erosion and is committed to providing an engineered solution for containing and directing stormwater runoff from these piles. This may include berms, ditches, and/or silt fencing.

The facility is inspected on a routine basis (see Section 4) and control measures are immediately repaired if necessary. If necessary, stockpiles are stabilized and re-contoured.

Vehicles are checked closely for leaks and pans are used to collect fluid when leaks occur. Leaks, drips, or other spills identified are cleaned up without using large amounts of water that can contaminate runoff from the site.

3.1.4 Spill Prevention and Response (2.1.2.4 and 5.2.5.1.c)

Potential stormwater contaminants include petroleum-based materials such as fuels, oils, and lubricants spilled or leaked from equipment. Storage tanks will not be kept on site. In the event of a spill or leak of hazardous materials at the facility, employees are required to immediately notify their supervisor. Immediate action is taken to contain and prevent the spread of any leaking petroleum-based product, or chemical, into a surface water or groundwater system.

MSGP 2.1.2.4 requirements for spill prevention and response:

- Clean up spills and leaks promptly using dry methods (e.g., absorbents) to prevent the discharge of pollutants;
- Use drip pans and absorbents if leaky vehicles and/or equipment are stored outdoors;
- Use spill/overflow protection equipment;
- Plainly label containers (e.g., "Used Oil," "Spent Solvents," "Fertilizers and Pesticides") that could be susceptible to spillage or leakage to encourage proper handling and facilitate rapid response if spills or leaks occur;
- Implement procedures for material storage and handling, including the use of secondary containment and barriers between material storage and traffic areas, or a similarly effective means designed to prevent the discharge of pollutants from these areas;
- Develop training on procedures for expeditiously stopping, containing, and cleaning up leaks, spills, and other releases. As appropriate, execute such procedures as soon as possible;
- Keep spill kits onsite, located near areas where spills may occur or where a rapid response can be made; and
- Notify appropriate facility personnel when a leak, spill or other release occurs.
- Specify cleanup equipment, procedures and spill logs, as appropriate, in the event of spills.

Spill response at this facility may require the manual application of sorbent materials and the construction of temporary containment structures to prevent spilled material from running off site and potentially discharging to a body of water. To respond appropriately to any accidental release, the following actions will be taken:

- The facility will maintain spill kits on site.
- Training will be provided to on-site crews on spill response and reporting procedures.

- Emergency procedures and contact/notification information will be posted at the project site.
- Employees are required to immediately notify their supervisor in the event of a spill or leak of hazardous materials at the facility.
- When a release is of an amount equal to or in excess of reportable quantity, procedures to notify the appropriate regulatory agency have been established:
 - According to 40 CFR § 110, anyone with knowledge of a discharge of oil to surface waters must immediately report the discharge to the **National Response Center (800-424-8802)**.
 - According to Idaho Administrative Procedures Act (IDAPA) 58.01.02.851.04(a), any release of 25 gallons or more must be reported to the **Idaho Department of Environmental Quality** within 24 hours of the release being identified.

Immediate action will be taken to contain and prevent the spread of any leaking petroleum-based product into surface or groundwater systems or off site.

3.1.5 Erosion and Sediment Controls (MSGP 2.1.2.5 and 6.2.5.1.d)

BMPs for surface mining minimize erosion and sedimentation associated with the excavation of tailings and other on-site disturbance activities. BMPs selected and implemented to limit erosion include seeding, mulching, and sodding to prevent soil from becoming dislodged and should be considered first. Sediment control BMPs such as silt fences, straw bale barriers, and brush sediment barriers trap sediment after it has eroded. Sediment control BMPs should be used to back-up erosion control BMPs.

Erosion and sediment controls include stabilization practices as well as structural controls. First, locations are staked out to minimize the amount of soil and vegetation disturbed. Next, pre-mining BMPs are installed as appropriate (e.g., sediment control measures such as silt fencing, straw bales, or fiber rolls). As construction begins, overburden is segregated and stockpiled for reclamation use. A vegetated buffer strip is maintained between the operations and nearest surface water, and additional BMPs are constructed as necessary (e.g., runoff conveyances such as water diversions or berms, slope stabilization measures such as mulching or matting). BMPs are maintained throughout the duration of area use, and reclamation activities (e.g., re-contouring, mulching and seeding) are conducted shortly after the cessation of activities and removal of equipment.

Stabilization and erosion control measures are frequently inspected, and necessary maintenance and repairs are conducted. Stabilization measures should be initiated immediately in portions of the site where clearing, grading, and/or excavation activities have temporarily ceased, but in no case more than 14 days after the clearing, grading and/or excavation activities in that portion of the site have temporarily ceased. In arid, semi-arid, and drought-stricken areas, or in areas subject to snow or freezing conditions, where initiating perennial vegetative stabilization measures is not possible within 14 days after mining, exploration, and/or construction activity has temporarily ceased, temporary vegetative stabilization measures must be initiated as soon as practicable. Until temporary vegetative stabilization is achieved, interim measures such as erosion control blankets with an appropriate seed base and tackifiers must be employed. In areas of the site where exploration and/or construction has permanently ceased prior to active mining, temporary stabilization measures must be implemented to

minimize mobilization of sediment or other pollutants until such time as the active mining phase commences.

Similarly, stabilization measures should be initiated immediately in portions of the site where mining, exploration, and/or construction activities have permanently ceased, but in no case more than 14 days after the exploration and/or construction activity in that portion of the site has permanently ceased. Until final stabilization is achieved, temporary stabilization measures, such as erosion control blankets with an appropriate seed base and tackifiers must be used.

Numerous BMPs are available for use and are implemented as needed. **Table 3-3** lists BMP options for erosion and sediment control. These BMPs provide a quick reference for controls that are likely to be well suited for use on the project site but do not represent an all-inclusive list. These measures are implemented as appropriate throughout the project site.

Table 3-3. BMP Options for Erosion and Sediment Control and Runoff Management

Best Management Practice	BMP Information Sheet No.
Slope/Soil Protection and Stabilization	
Mulching	IDL BMP I.3
Geotextile	IDEQ BMP 53
Matting	IDL BMP I.1
Riprap	IDL BMP I.7
Runoff and Collection	
Siltation Berms	IDL BMP III.4
Temporary Berm	IDEQ BMP 70
Waterbars	IDL BMP III.5
Sediment Collection	
Straw Bale Barrier	IDL BMP V.1
Silt Fence	IDL BMP V.4
Vegetative Buffer Strip	IDL BMP V.3
Sediment Trap (Basin)	IDEQ BMP 66

Source: IDL = Idaho Department of Lands. Best Management Practices for Mining in Idaho, 1992. IDEQ – Idaho Department of Environmental Quality, Idaho Catalog of Stormwater Best Management Practices, April 2020.

3.1.6 Management of Stormwater (MSGP 2.1.2.6)

The following BMPs may be implemented at the facility to manage runoff:

- Temporary diversions to direct contaminated flows to sediment traps (i.e., straw bale barriers, silt fences, brush sediment barriers).

In general, silt fences are placed down slope of the excavation area. Straw bales (or equivalent) are then placed and staked outside the silt fence. Latah County is responsible for Moose Creek Road, including stormwater runoff management from the roadway, therefore, that is not covered in this SWPPP. However, during the period when I-Minerals temporarily reroutes the road, maintenance and implementation of stormwater BMPs will be I-Minerals' responsibility.

Reclamation activities (either concurrent reclamation or interim stabilization) for disturbed areas are generally completed by the end of October of each year, so that the area is stable and BMPs are in

place going into the winter months. Following completion of excavation activities in the designated area, reclamation will involve contouring and grading; growth medium preparation; seeding, planting, and mulching; and maintenance and monitoring (see the plan of operations for description of BMPs for reclamation).

3.1.7 Salt Storage Piles or Piles Containing Salt (MSGP 2.1.2.7)

Salt usage is limited and there are no salt piles used for de-icing or other commercial or industrial purposes on the project site.

3.1.8 Dust Generation and Vehicle Tracking of Industrial Materials (MSGP 2.1.2.10)

See Section 3.1.5 of this SWPPP.

3.2 Numeric Effluent Limitations Based on Effluent Limitations Guidelines (MSGP 2.1.3)

I-Minerals' activities are not subject to the numerical limits listed in Table 2-1 of the MSGP.

3.3 Water Quality-based Effluent Limitations and Water Quality Standards (MSGP 2.2.1)

The 2021 MSGP defines *discharge point* as the location where collected and concentrated stormwater flows are discharged from the facility such that the first receiving water body into which the discharge flows, either directly or through a separate storm sewer system, is a water of the U.S. No stormwater discharge points have been identified as part of the Project. Rather the potential for a stormwater entering a waters of the U.S. is through sheet flow to the intermittent stream east of the site. This intermittent stream discharges into Moose Creek, which is a listed 303(d) stream and has a TMDL for E. coli and temperature (ID17060306CL053_03).

3.4 Sector-Specific Non-Numeric Effluent Limits (MSGP Part 8)

The I-Minerals facility falls under MSGP Sector J – Mineral Mining and Processing Facilities. The SIC is 1455 – Kaolin and Ball Clay. Additional technology-based effluent limits (MSGP 8.J.4 and 8.J.5) include the following.

3.4.1 Technology Based Effluent Limits for Active Mining Activities

- Employee Training (MSGP 8.J.5.1)
 - See Section 4.5 for description of training.
- Stormwater Controls (consider additional measures besides those identified in MSGP Part 2):
 - *Stormwater Diversions*: Divert stormwater away from potential pollutant sources through implementation of control measures – stormwater diversion away from mining area is not considered feasible nor necessary for the Project.
 - *Capping*: A cap is not considered feasible nor necessary for the Project
 - *Treatment*: If treatment of stormwater (e.g., chemical or physical systems, oil and water separators, artificial wetlands) is necessary to protect water quality, describe the type and location of treatment used. No treatment is proposed for Project.

- *Discharge Testing (MSGP 8.J.5.3)*: Test or evaluate all outfalls covered under this permit for the presence of specific mining-related but unauthorized non-stormwater discharges such as discharges subject to effluent limitations guidelines. No unauthorized non-stormwater discharges have been identified and no testing is anticipated.

3.4.2 Additional Sector J requirements (MGSP 8.J.6):

- **Nature of Industrial Activities (MSPG 8.J.6.1)**

The facility activities are described in Section 1.4.

- **Site Map (MSGP 8.J.6.2)**

See Section 1.5, **Figure 1**, **Figure 2**, and **Figure 3**.

- **Potential Pollutant Sources (MSGP 8.J.6.3)**

See Section 2.1.

- **Documentation of Control Measures (MSGP 8.J.6.4)**

The description of the control measures for the facility activities is described Section 3.

- **Employee Training (MSGP 8.J.6.5)**

See Section 4.5 for description of training.

- **Certification of Permit Converge for Commingled Non-Stormwater Discharges (MSGP 8.J.6.6)**

See Section 2.3. There is no co-mingling of stormwater and unauthorized non-stormwater.

SECTION 4: SCHEDULES AND PROCEDURES

The MSGP requires indicator monitoring for Sector J3 – Clay, Ceramic, and Refractory Materials (see Section 4.7). In addition, inspections, including the visual observation of site conditions, BMPs and stormwater runoff, are required (see Section 5.0).

4.1 Good Housekeeping (MSGP 6.2.5.1.a)

Procedures: See Section 3.2.

Schedule: Good housekeeping is evaluated during routine stormwater inspections (minimum quarterly). Solids waste container, used oil, and any used hazardous materials are picked up and disposed on an “as-needed” basis rather than a routine schedule.

4.2 Maintenance (MSGP 6.2.5.1.b)

Procedures: See Section 3.3.

Schedule: See Section 3.3 for description of maintenance activities associated with equipment and vehicles and stormwater control measures. The need for maintenance of control measures is established specifically by the BMP and is also based on results of routine stormwater inspections. Inspections of control measures are quarterly, at a minimum, but typically more frequent due to Sector J inspection requirements.

4.3 Spill Prevention and Response Procedures (MSGP 6.2.5.1.c)

Procedures: See Section 3.4 relating to spill prevention and response, including reporting procedures.

4.4 Erosion and Sediment Control (MSGP 6.2.5.1.c)

No polymers and other chemical treatments are used for erosion and sediment control.

4.5 Employee Training (MSGP 2.1.2.8 and 6.2.5.1.e)

MSGP 2.1.2.8, the following personnel should receive training (see Table 1-1 for list of persons):

- Personnel who are responsible for the design, installation, maintenance, and/or repair of controls (including pollution prevention measures);
- Personnel responsible for the storage and handling of chemicals and materials that could become pollutants discharged via stormwater;
- Personnel who are responsible for conducting and documenting monitoring and inspections as required in 2021 MSGP Parts 3 and 4; and
- Personnel who are responsible for taking and documenting corrective actions as required in 2021 MSGP Part 5.

Employee training is essential to effective SWPPP implementation. Properly trained personnel are more capable of preventing spills, responding safely and effectively to an accident, and recognizing

situations that could lead to stormwater contamination. Personnel responsible for implementing activities necessary to meet the conditions of the MSGP receive training at least once per year. Training is documented and becomes part of the SWPPP (Appendix B). Training topics include the following:

- Use of the SWPPP
- Spill prevention and response procedures
- Materials management practices
- Good housekeeping practices
- How to conduct inspections, record keeping, and corrective actions

Goals and requirements of the SWPPP are emphasized during training sessions. See Section 1.3 for list of personnel and responsibilities, including training. Example training sign in sheets are provide in Appendix B.

4.6 Inspections and Assessments (MSGP Part 3 and Part 6.2.5.2)

4.6.1 Routine Facility Inspections (MSPG Part 3.1)

Inspection Frequency for Active Mining Activities

- Minimum of quarterly inspections unless adverse weather conditions make the site inaccessible. At least once each calendar year, routine inspection must be conducted during a period when a stormwater discharge is occurring. Use inspection log in Appendix F.
- Inspections must be performed by at least one member of Stormwater Pollution Prevention Team.
- During the inspection, examine or look out for the following:
 - Industrial materials, residue, or trash that may have or could come into contact with stormwater;
 - Leaks or spills from industrial equipment, drums, tanks and other containers;
 - Tracking or blowing of raw, final, or waste materials from areas of no exposure to exposed areas;
 - Erosion of soils
 - Non-authorized non-stormwater discharges
 - Control measures needing replacement, maintenance or repair.

Areas to be Inspected

Inspect the following areas:

- Disturbed areas – drill pads and access road
- Stormwater controls and pollution prevention measures
- Locations where stabilization measures have been implemented
- Material, waste, borrow, or equipment storage and maintenance areas

- Areas where stormwater flows – inspect areas downgradient of disturbed areas to assess any stormwater flows.

No outfalls (point discharge) points have been identified as part of the Project.

What to Check for During Inspections

During inspections, check the following (see inspection log form in Appendix F):

- Whether all stormwater controls are installed, operational and working as intended;
- Whether any new or modified stormwater controls are needed;
- For conditions that could lead to a spill or leak;
- For visual signs of erosion/sedimentation at points of discharge.

Inspection Report

Within 24 hours of an inspection, complete the stormwater site inspection report (see Appendix F).

Key items in the form include the following:

- Inspection date;
- Name and title of inspector(s);
- Summary of inspection findings;
- Rainfall amount that triggered the inspection (if applicable);
- If it was unsafe to inspect a portion of the site, include documentation of the reason and the location(s);
- Each inspection report must be signed;
- Keep a current copy of all reports at the site or at an easily accessible location.

4.6.2 Quarterly Visual Assessment of Stormwater Discharges

Once each quarter, a grab sample of discharged stormwater is collected from each outfall and a visual assessment of each sample is conducted. Exceptions to this requirement are described at the end of this section.

Visual assessments must be made

- Of a discharge sample contained in a clean, colorless glass or plastic container, and examined in a well-lit area;
- Of samples collected within the first 30 minutes of an actual discharge from a storm event. If it is not possible to collect the sample within the first 30 minutes of discharge, the sample must be collected as soon as practicable after the first 30 minutes and the reason must be documented for why it was not possible to take the sample within the first 30 minutes. In the case of snowmelt, samples must be taken during a period with a measurable discharge; and
- For storm events, on discharges that occur at least 72 hours (3 days) from the previous discharge. The 72-hour (3-day) storm interval does not apply if you document that less than a 72-hour (3-day) interval is representative for local storm events during the sampling period.

The sample is visually assessed for the following water quality characteristics (see USEPA's *Industrial Stormwater Monitoring and Sampling Guide*, March 2009, EPA 832-B-09-003 for more details):

Color – If the discharge has an unusual color, such as reddish, brown, or yellow hue, this may indicate pollutants or suspended sediment.

Odor – If the discharge has a noticeable odor, for instance if it smells like gasoline fumes, rotten eggs, raw sewage, or solvents odor, or has a sour smell, this could be indicative of pollutants in the discharge.

Clarity – If the discharge is not clear, but is instead cloudy or opaque, this could indicate elevated levels of pollutants in the discharge.

Floating solids – If materials floating at or near the top of the bottle are observed, take note of what the materials appear to be.

Settled solids – Wait about a half hour after collection, then note the type and size of materials that are settled at the bottom of the bottle.

Suspended solids – Particles suspended in the water will affect its clarity, and color and could be attributable to pollutant sources.

Oil sheen – Check the surface of the water for a rainbow color or sheen; this would indicate the presence of oil or other hydrocarbons in the discharge.

Foam – Gently shake the bottle and note whether there is any foam.

Other obvious indicators of stormwater pollution

The quarterly visual assessments are performed by at least one member of the I-Minerals facility's Stormwater Pollution Prevention Team. **Table 4-1** summarizes quarterly visual inspections requirements.

Table 4-1. Quarterly Inspection Responsibility and Schedule

Persons Responsible for Visual Assessment:	A member of the Stormwater Pollution Prevention Team. See Section 1.3 for names.
Schedule for Assessments (see Exceptions to Quarterly Visual Assessments below):	Quarterly: 1 st Quarter (Jan through March) 2 nd Quarter (April through June) 3 rd Quarter (July through September) 4 th Quarter (October through December)
Specific Areas for Inspections:	Sheet flow to intermittent stream; See Visual Assessment Form in Appendix F.

Documentation of visual assessments is to be kept with the SWPPP. There is no permanent facility on site, thus the SWPPP and records are maintained by I-Minerals in its Hayden, Idaho office. However, when mining activities are occurring, personnel have a copy of the SWPPP on site. Visual assessment findings are not required to be submitted to the USEPA, unless specifically requested to do so by USEPA. Appendix F contains the visual assessment form.

Exceptions to Quarterly Visual Assessments:

The MSGP allows for samples for quarterly visual assessments to be distributed during seasons when precipitation runoff occurs. Thus, the goal will be to obtain at least one visual assessment for

each quarter but this may vary depending upon climate and drainage conditions. Thus, some quarters may have more than one visual assessment and other quarters may have none. Regardless, a minimum of four visual assessments will be attempted each year. If no discharge occurs in a calendar year from an outfall at which a visual assessment could be conducted, this will be documented and documentation maintained with this SWPPP. Exceptions will be noted in the annual report.

Outfall: The MSGP defines outfalls as those locations where the stormwater exits the facility, including pipes, ditches, swales, and other structures that transport stormwater. For purposes of the quarterly visual inspections, the roadside ditch located near the lower portion of the clay tailings is assessed during runoff (anticipated to occur during spring runoff). The county is responsible for stormwater management Moose Creek Road and associated ditches and will not be assessed as part of this SWPPP. However, the temporary road used to re-route Moose Creek Road during mining activities (anticipated in year 4 or 5 of operations) will be assessed by collecting stormwater runoff and following the visual assessment procedures described above.

4.6.3 Exception to Routine Facility Inspections and Quarterly Visual Assessments for Inactive and Unstaffed Sites.

While the site is mostly unstaffed, routine inspections can occur on a quarterly basis, at minimum.

4.7 Monitoring (MSGP Part 6.2.5.3 and Part 4.0)

The following monitoring activities are applicable for Sector J, subsector J3):

- ☒ Indicator monitoring
- ☐ Benchmark monitoring
- ☐ Effluent limitations guidelines monitoring
- ☐ State- or tribal-specific monitoring
- ☐ Impaired waters monitoring
- ☐ Other monitoring required by USEPA

4.7.1 Indicator Monitoring (MSGP 4.2.1)

Indicator monitoring is required for Sector J, subsector J3 (**Table 4-2**).

Table 4-2. Indicator Monitoring Requirements

Subsector	Indicator Monitoring Parameter	Indicator Monitoring Threshold
Applies to J3 (clay, ceramic, and refractory materials (SIC 1455))	Chemical oxygen demand (COD) Total suspended solids (TSS) pH	Report only/ no thresholds or baseline values.

Polycyclic aromatic hydrocarbons (PAHs): Section J requires monitoring for PAHs in stormwater discharges from paved surfaces that will be initially sealed or resealed with coal-tar sealcoat where industrial activities are located during coverage under this permit. The site is not paved (Moose Creek Road is a gravel based). No PAH monitoring is required.

Sample location: The MSGP defines outfalls as those locations where the stormwater exits the facility, including pipes, ditches, swales, and other structures that transport stormwater. For purposes of indicator monitoring, the roadside ditch located near the lower portion of the clay tailings is assessed during runoff (anticipated to occur during spring runoff). The county is responsible for stormwater management Moose Creek Road and associated ditches and will not be assessed as part of this SWPPP. However, the temporary road used to re-route Moose Creek Road during mining activities (anticipated in year 4 or 5 of operations) will be assessed by collecting stormwater runoff and a sample collected to support indicator monitoring.

Pollutant to be sampled: See Table 4-2.

Monitoring schedule: See Table 4-3.

Table 4-3. Indicator Monitoring Responsibility and Schedule

Persons Responsible for Indicator Monitoring:	A member of the Stormwater Pollution Prevention Team. See Section 1.3 for names.
Schedule for Sampling (see Exceptions to Quarterly Sampling below):	Indicator COD, TSS, and pH is quarterly: 1 st Quarter (Jan through March) 2 nd Quarter (April through June) 3 rd Quarter (July through September) 4 th Quarter (October through December)
Specific Areas for sampling:	See sample location description above.

Numerical limits: None, report results only.

Procedures: For indicator monitoring, either a grab or composite sample is acceptable. Because of the infrequency of runoff and no personnel on site except during mining events (which is infrequent), a grab sample is the appropriate sampling method. The following general method is used:

- Sampling should follow EPA's *Industrial Stormwater Monitoring and Sampling Guide* (March 2009, EPA 832-B-09-003).
- Obtain sample bottles, with appropriate bottle size, type, and preservative from the analytical laboratory. The laboratory will be able to provide the necessary bottles based on analytic methods used for COD, TSS, and pH. Also check with laboratory on holding times and determine if samples need to be overnighed (shipped) to the laboratory. Note that pH is typically performed in the field using a field pH meter and probe. If available, measure in field, if equipment not available, have laboratory report pH.
- Collect samples during runoff events from the roadside ditch immediately downgradient of the mine area. Per the Guide:

If your stormwater is discharged via a drainage ditch or vegetated swale, take a grab sample from a consistently flowing part of the ditch / swale. If the ditch / swale is too small or shallow, install a barrier device in the channel or deepen a small area so you are able to sample directly into the bottles. Allow sufficient time to pass after disturbing the bottom so that any solids stirred up do not contaminate your sample.

- Collect the sample by dipping the bottle into the stormwater runoff or by using a sacrificial bottle (clean bottle that can be used for dipping into the stormwater and then transfer to the laboratory bottles).
- Place bottles into a cooler, chilled on ice, and prepare cooler for overnight shipment to the analytical laboratory (or transport to lab by vehicle). Complete appropriate chain of custody forms, including signature and date, and record sampling activity in a field notebook.
- Field blanks and duplicates are not required.

4.7.2 Benchmark Monitoring (MSGP 4.2.2 and Part 8 and Part 9)

The MSGP stipulates pollutant benchmark concentrations that may be applicable to the facility's discharge. For Sector J3 – Clay, Ceramic, and Refractory Materials, no benchmark monitoring is required.

4.7.3 Effluent Limitations Monitoring (MSGP 4.2.3 and Part 8)

For Sector J3 – Clay, Ceramic, and Refractory Materials (SIC 1455 – Kaolin and Ball Clay), no effluent limitation monitoring is required.

4.7.4 State or Tribal Provisions Monitoring (MSGP 4.2.4 and Part 9)

Per MSGP 9.10.3, additional monitoring required in Idaho includes provisions for benchmark and effluent limitations monitoring, none of which apply to Sector J3 – Clay, Ceramic, and Refractory Materials.

4.7.5 Discharges to Impaired Waters Monitoring (MSGP 4.2.5)

Part 4.2.5 of the permit clarifies provisions for discharges to water quality impaired receiving waters. According to the General Fact Sheet, for the purposes of the MSGP, a permittee discharges to an impaired water if the discharge is directly to the impaired water. The unnamed intermittent stream east of the facility is not listed as an impaired water in the IDEQ 2012 *Final Integrated Report* (303[d]/305[b]). Therefore, the I-Minerals facility has no obligations under Part 6.2.4 of the permit.

4.7.6 Other Monitoring as Required by USEPA (MSGP Part 4.2.6)

Not applicable.

SECTION 5: DOCUMENTATION TO SUPPORT ELIGIBILITY CONSIDERATIONS UNDER OTHER FEDERAL LAWS

5.1 Documentation Regarding Endangered Species (MSGP Part 6.2.6.1 and Appendix E)

The Endangered Species Act (ESA) review procedures outlined in Appendix E of the MSGP consist of four progressive steps for determining eligibility under criteria in Part 1.1.4.5 of the MSGP. Step one determines if eligibility requirements for Criteria B, D, or E can be met. These criteria include another operator that has accounted for the site's action area in their valid certification of eligibility under the 2021 MSGP, a previously completed ESA Section 7 consultation, or a previously issued ESA Section 10 permit. These criteria are not applicable to the mine site, so the process continued to Step Two.

Step two determines the extent of the facility's action area. The MSGP defines action area as all areas affected directly or indirectly by the stormwater discharges, allowable non-stormwater discharges, and stormwater discharge-related activities and not merely the immediate area involved in the discharge and activities. For the Project, the action area includes the main mine area and the portion down gradient where stormwater could potentially flow.

Step three determines if listed threatened or endangered species and/or critical habitat are present in the action area. Threatened and endangered species and critical habitat in the action area were reviewed using the US Fish and Wildlife Service's Information, Planning, and Conservation System (IPaC). Official Species List (Appendix G) identified no threatened or endangered species in the action area:

- ESA-listed species managed by the National Marine Fisheries Service are not located within the action area.
- The official species list from IPaC did not identify any species for the action area. Therefore, it can be concluded that no listed species are located in the action area, and the facility is eligible under Criterion A. .

5.2 Documentation Regarding Historic Properties (MSGP 6.2.6.2 and Appendix F)

The historic property review procedures outlined in Appendix F of the MSGP consist of four progressive steps for determining eligibility under criteria in Part 1.1.4.6 of the MSGP. Step one determines whether I-Minerals is an existing facility reapplying for certification under the 2021 MSGP after having had coverage under the 2015 MSGP. Since I-Minerals is not constructing or installing new stormwater control measures, Criterion A is met.

SECTION 6: REPORTING, RECORD KEEPING, AND CORRECTIVE ACTION

Most information required to be submitted by this permit shall be submitted via USEPA's electronic National Pollutant Discharge Elimination System (NPDES) eReporting tool (NeT). To access NeT, go to:

<http://water.epa.gov/polwaste/npdes/stormwater/Stormwater-eNOI-System-for-EPAs-MultiSector-General-Permit.cfm>

Information required to be submitted to USEPA via NeT includes the following:

- NOI
- No Exposure certification
- Discharge monitoring reports
- Notice of Termination
- Annual report

6.1 Reporting Indicator Monitoring Data to USEPA (MSGP 7.3)

Monitoring data (indicator monitoring) must be submitted to USEPA using Net-DMR. For both indicator monitoring, sampling results must be submitted to USEPA no later than 30 days after receiving laboratory results for each monitoring period. For reporting periods that did not have a discharge, USEPA must still be notified via Net-DMR that no discharges occurred no later than 30 days after the end of the period (quarterly, see Table 4-3).

6.2 Annual Report (MSGP 7.4)

An annual report must be completed and submitted electronically to USEPA by January 30 for each year of permit coverage. The report includes the following:

- A summary of I-Minerals' past year's routine facility inspection documentation.
- A summary of I-Minerals' past year's quarterly visual assessment documentation (for the Project, report that there no discharges).
- A summary of past year's corrective action documentation. If corrective action is not yet completed at the time of submission of the annual report, I-Minerals must describe the status of any outstanding corrective action(s). Also the report should describe any incidents of noncompliance in the past year or currently ongoing, or if none, provide a statement that I-Minerals is in compliance with the permit.
- The annual report must include a statement, signed, and certified in accordance with the permit (see annual report form in Appendix C).

6.3 Reporting an Exceedance for Numeric Effluent Limit

Not applicable to the Project.

6.4 Recordkeeping (MSGP 7.8)

I-Minerals keeps the following inspection and certification records in the same location as the SWPPP:

- A copy of the NOI submitted to USEPA along with any correspondence (**Appendix D**).
- A copy of 2021 MSGP (electronic copy) (**Appendix E**).
- Documentation of maintenance and repairs of control measures, including the date(s) of regular maintenance, date(s) of discovery of areas in need of repair/replacement, and for repairs, date(s) that the control measure(s) returned to full function, and the justification for any extended maintenance/repair schedules (**Appendix F**).
- All inspection reports, including the Routine Facility Inspection Reports (see Part 3.1) and Quarterly Visual Assessment Reports (**Appendix F**).
- Description of any deviations from the schedule for visual assessments and/or monitoring, and the reason for the deviations (e.g., adverse weather or it was impracticable to collect samples within the first 30 minutes of a measurable storm event) (**Appendix F**).
- Corrective action documentation required per Part 4.4 (**Appendix F**).
- With the exception of the first **two bulleted items in this list**, these are records that will be updated throughout the permit term. Follow the instructions in **Appendix F**.

6.5 Corrective Action (MSGP 5.0)

If the following conditions occur, I-Minerals must review and revise the selection, design, installation, and implementation of control measures to correct the condition and reduce the potential to re-occur in the future:

- An unauthorized release or discharge (e.g., spill, leak, or discharge of non-stormwater not authorized by this or another NPDES permit) at the facility.
- Control measures at the facility are not stringent enough for the discharge to meet applicable water quality standards (since there is no discharge this would not be applicable to site).
- An inspection or evaluation of the facility by USEPA or IDEQ determines that modifications to the control measures are necessary.
- Routine facility inspection results find that the control measures are not being properly installed, operated, or maintained.
- Whenever stormwater runoff shows evidence of stormwater pollution (e.g., color, odor, floating solids, settled solids, suspended solids, foam).
- Construction or a change in design, operation, or maintenance at the facility significantly changes the nature of pollutants discharged in stormwater or significantly increases the quantity of pollutants discharged.

6.5.1 Corrective Action Deadlines

Immediate Actions - If corrective action is needed, I-Minerals immediately takes reasonable steps to minimize or prevent the discharge of pollutants until a permanent solution is installed and made operational, including cleaning up any contaminated surfaces so that the material does not

discharge in subsequent storm events. The MSGP states that “immediately” means same day or if late in the day and not deemed a significant risk for a discharge, the following work day.

Subsequent Actions - If additional actions are necessary beyond conducting an immediate action, the corrective action must be completed within 14 calendar days from the time of discovery or before the next storm event (if possible). See MSGP 4.3.2 for more detail on going beyond 14 days for a corrective action.

Additional Implementation Measures (AIM) - Additional measures are required in the permit if a benchmark threshold is exceeded. For this subsector, benchmark monitoring is not required, and therefore, AIM does not apply.

6.5.2 Documentation

Within 24 hours of discovery of a condition listed above, I-Minerals must document the following information:

- Describe the condition triggering the need for corrective action review.
- Describe the immediate actions taken, including time and date of cleanup, notifications made, and staff involved.
- Date the problem was identified.
- A statement signed and certified in accordance with MSGP Appendix B, Subsection 11.

Within 14 days of discovery of a listed condition, I-Minerals must document the following information:

- Summarize corrective action taken or to be taken.
- Notice of whether SWPPP modifications are required as a result of this discovery or corrective action.
- Date corrective action initiated.
- Date corrective action completed or expected to be completed.

This documentation is submitted as part of the annual report and a copy is maintained on site with the SWPPP (Appendix F).

SECTION 7: SWPPP CERTIFICATION

The MSGP specifies the SWPPP must be signed and dated in accordance with Appendix B, Subsection 11 (MSGP Part 6.2.7). Section B.11.E requires the following certification:

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information contained therein. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing.

Responsible official and signature:

Name: _____ Title: _____

Signature: _____ Date: _____

SECTION 8: SWPPP MODIFICATIONS (MSGP 6.3)

This SWPPP is a living document and must be modified and updated, as necessary, in response to corrective actions. If the SWPPP needs to be modified in response to a corrective action or for other reasons, the Section 7 certification statement must be re-signed. For any other SWPPP modification, a log with a description of the modification, the name of the person making it, and the date and signature of that person should be maintained in a log (Appendix F). Outdated certifications will be retained in the plan record file.

SECTION 9: SWPPP AVAILABILITY

The current SWPPP (with the exception of any confidential business or restricted information) is available to the public. I-Minerals has elected to provide a URL link to the SWPPP as part of the NOI submittal. The link is to I-Minerals' website that contains the SWPPP in .pdf format.

SECTION 10: 401 WATER QUALITY CERTIFICATION

IDEQ has authority to review the MSGP and issue a water quality certification decision. IDEQ placed a number of conditions specific for Idaho permittees in the 2015 MSGP (<https://www.deq.idaho.gov/media/60177118/multi-sector-general-permit-401-certification.pdf>). The 2021 MSPG has not been updated. The following Idaho requirements are assumed pertinent to this SWPPP (IDEQ will take primacy of the MSGP in July 2021 so the following is subject to change):

- **Monitoring Frequency for Numeric Effluent Limitations.** Since numeric effluent limitations monitoring is not applicable to Sector J3, this requirement does not apply.
- **Follow-up Monitoring for Benchmark Concentrations.** Since benchmark monitoring is not applicable to Sector J3, this requirement does not apply.
- **Monitoring of Discharges to Impaired Waters.** Person filling out the NOI must use the most current IDEQ integrated report, which is from 2012.
- **New or Expanding Discharges.** Since the Project does not meet the definition of a new or expanding discharger, this requirement does not apply.
- **SWPPP Availability.** If requested by IDEQ, the permittee must submit a copy of the SWPPP to IDEQ within 14 days of the request.
- **Submission of NOIs, Monitoring Data, and Additional Reporting.** Copies of the following information must be sent to IDEQ at the same time it is submitted to USEPA:
 - Notices of Intent and Termination
 - Monitoring data collected pursuant to MSGP Part 6 within 30 days of receipt of analytical results
 - Exceedance reports as required by MSGP 6.3 within 30 days of receipt of analytical results
 - Planned changes reports
- **Additional Reporting of Discharges Containing Hazardous Materials or Oil.** Unauthorized discharges containing hazardous materials or oil must be reported to the Idaho Bureau of Homeland Security – State Communications Center (1-800-632-8000) or to the Idaho IDEQ Boise Regional Office (see IDAPA 58.01.02.850) according to protocol in the SPCC Plan.

SECTION 11: REFERENCES

Idaho Department of Environmental Quality (IDEQ). 2012. *Final Integrated Report* (303[d]/305[b]).

Idaho Department of Lands (IDL). 1992. *Best Management Practices for Mining in Idaho*.

Forestry BMPs in Idaho. University of Idaho. [Forestry Best Management Practices | UI Extension \(uidaho.edu\)](http://uidaho.edu)

U.S. Environmental Protection Agency (USEPA). 2021. Multi-Sector General Permit (MSGP) for Stormwater Discharges Associated with Industrial Activities.

<http://water.epa.gov/polwaste/npdes/stormwater/EPA-Multi-Sector-General-Permit-MSGP.cfm>

USEPA. 2009. *Industrial Stormwater Monitoring and Sampling Guide*, March 2009, EPA 832-B-09-003.

SECTION 12: SWPPP APPENDICES

Appendix A – Best Management Practices
Appendix B – Training Log
Appendix C – USEPA Annual Reporting Form
Appendix D – NOI and Acknowledgement Letter from USEPA/ State
Appendix E – MSGP
Appendix F – SWPPP Forms
Appendix G – Endangered Species Act Consultation Documentation

APPENDIX A

BEST MANAGEMENT PRACTICES

(Due to its length, the reader is referred to the BMP Catalog online at:

[2015AFP36 2020 BMP Catalog Update - FULL DOCUMENT - 4-21-2020\(2\).pdf](#)

[bmp1992ttl.pdf \(idaho.gov\)](#)

EMPLOYEE TRAINING FORM

[illegible]

APPENDIX C

USEPA ANNUAL REPORTING FORM

MSGP Part 7.4 requires you to use the NPDES eReporting Tool, or “NeT”, to prepare and submit your Annual Report. A hard copy of the annual report is provided in Appendix I of the 2021 MSGP.

APPENDIX D

NOI AND ACKNOWLEDGEMENT LETTER FROM USEPA

APPENDIX E

2021 MULTI-SECTOR GENERAL PERMIT FOR STORMWATER DISCHARGES ASSOCIATED WITH INDUSTRIAL ACTIVITIES (MSGP)

A copy of the 2021 MSGP is provided in a CD along with an electronic copy of the SWPPP and forms. The reader can also obtain a copy of the 2021 MSGP from the following EPA site:

<http://water.epa.gov/polwaste/npdes/stormwater/EPA-Multi-Sector-General-Permit-MSGP.cfm>

APPENDIX F

SWPPP FORMS

The following forms are included:

- Maintenance
- Routine Facility Inspection Reports
- Quarterly Visual Assessment Reports
- Corrective Action Documentation
- SWPPP Amendment Log

Maintenance

Instructions:

- Include in your records documentation of maintenance and repairs of control measures and industrial equipment (see Part 2.1.2.3), including:
 - the control measure/equipment maintained,
 - date(s) of regular maintenance,
 - date(s) of discovery of areas in need of repair/replacement, and for repairs, date(s) that the control measure/equipment was returned to full function, and
 - the justification for any extended maintenance/repair schedules and the notification to your EPA Region that you need an extension past 45 days to complete repairs/maintenance.
- As a reminder:
 - you are required to take all reasonable steps to prevent or minimize the discharge of pollutants until the final repair or replacement is implemented.
 - final repair/replacements of stormwater controls should be completed as soon as feasible but no later than 14 days, or if that is infeasible within 45 days.
 - if the completion of stormwater control repairs/replacement will exceed the 45 day timeframe, you may take the minimum additional time necessary to complete the maintenance, provided you notify the EPA Regional Office and document your rationale in your SWPPP.
- Provide information, as shown below, to document your maintenance activities for each

Control Measure Maintenance Records (copy information below for each control measure)

Control Measure: [Insert Name of Control Measure](#)

Regular Maintenance Activities: [Describe maintenance activities](#)

Regular Maintenance Schedule: [Insert Maintenance Schedule](#)

Date of Maintenance Action: [Insert Date of Action](#)

Reason for Action: ☐ **Regular Maintenance** ☐ **Discovery of Problem**

If Problem,

- Description of Action Required: [Describe actions taken in response to problem](#)

- Date Control Measure Returned to Full Function: [Insert Date](#)

- Justification for Extended Schedule, if applicable: [Insert Justification \(if applicable\)](#)

Notes: [Insert Notes \(if applicable\)](#)

Industrial Equipment/Systems: [Insert Name of Industrial Equipment/System](#)

Regular Maintenance Activities: [Describe maintenance activities](#)

Regular Maintenance Schedule: [Insert Maintenance Schedule](#)

Date of Maintenance Action: [Insert Date of Action](#)

Reason for Action: ☐ Regular Maintenance ☐ Discovery of Problem

If Problem,

- Description of Action Required: [Describe actions taken in response to problem](#)

- Date Industrial Equipment Returned to Full Function: [Insert Date](#)

- Justification for Extended Schedule, if applicable: [Insert Justification \(if applicable\)](#)

Notes: [Insert Notes \(if applicable\)](#)

Date of Maintenance Action: [Insert Date of Action](#)

Reason for Action: ☐ Regular Maintenance ☐ Discovery of Problem

If Problem,

- Description of Action Required: [Describe actions taken in response to problem](#)

- Date Industrial Equipment Returned to Full Function: [Insert Date](#)

- Justification for Extended Schedule, if applicable: [Insert Justification \(if applicable\)](#)

Notes: [Insert Notes \(if applicable\)](#)

Industrial Equipment and Systems Maintenance Records (copy information below for each industrial equipment/system)

Date of Maintenance Action: [Insert Date of Action](#)

Reason for Action: ☐ Regular Maintenance ☐ Discovery of Problem

If Problem,

- **Description of Action Required:** Describe actions taken in response to problem
- **Date Industrial Equipment Returned to Full Function:** Insert Date
- **Justification for Extended Schedule, if applicable:** Insert Justification (if applicable)

Notes: Insert Notes (if applicable)

Date of Maintenance Action: Insert Date of Action

Reason for Action: ☐ Regular Maintenance ☐ Discovery of Problem

If Problem,

- **Description of Action Required:** Describe actions taken in response to problem
- **Date Industrial Equipment Returned to Full Function:** Insert Date
- **Justification for Extended Schedule, if applicable:** Insert Justification (if applicable)

Notes: Insert Notes (if applicable)

Date of Maintenance Action: Insert Date of Action

Reason for Action: ☐ Regular Maintenance ☐ Discovery of Problem

If Problem,

- **Description of Action Required:** Describe actions taken in response to problem
- **Date Industrial Equipment Returned to Full Function:** Insert Date
- **Justification for Extended Schedule, if applicable:** Insert Justification (if applicable)

Notes: Insert Notes (if applicable)

Routine Facility Inspection Reports

Instructions:

- Include in your records copies of all routine facility inspection reports completed for the facility.
- The sample inspection report is consistent with the requirements in Part 3.1.2 of the 2021 MSGP relating to routine facility inspections. Facilities subject to state industrial stormwater permits may also find this form useful. **If your permitting authority provides you with an inspection report, use that form.**

Using the Sample Routine Facility Inspection Report

- This inspection report is designed to be customized according to the specific control measures and activities at your facility. For ease of use, you should take a copy of your site plan and number all of the stormwater control measures and areas of industrial activity that will be inspected. A brief description of the control measures and areas that were inspected should then be listed in the site-specific section of the inspection report.
- You can complete the items in the “General Information” section that will remain constant, such as the facility name, NPDES tracking number, and inspector (if you only use one inspector). Print out multiple copies of this customized inspection report to use during your inspections.

When conducting the inspection, walk the site by following your site map and numbered control measures/areas of industrial activity to be inspected. Also note whether the “Areas of Industrial Materials or Activities exposed to stormwater” have been addressed (customize this list according to the conditions at your facility). Note any required corrective actions and the date and responsible person for the correction.

Stormwater Industrial Routine Facility Inspection Report

General Information			
Facility Name	Insert Name		
NPDES Tracking No.	Insert Tracking No.		
Date of Inspection	Insert Date	Start/End Time	Insert Start/End Time
Inspector's Name(s)	Insert Name		
Inspector's Title(s)	Insert Title		
Inspector's Contact Information	Insert Contact Info		
Inspector's Qualifications	Insert qualifications or add reference to the SWPPP		
Weather Information			
Weather at time of this inspection? <input type="checkbox"/> Clear <input type="checkbox"/> Cloudy <input type="checkbox"/> Rain <input type="checkbox"/> Sleet <input type="checkbox"/> Fog <input type="checkbox"/> Snow <input type="checkbox"/> High Winds <input type="checkbox"/> Other: _____ Temperature: _____			
Have any previously unidentified discharges of pollutants occurred since the last inspection? <input type="checkbox"/> Yes <input type="checkbox"/> No If yes, describe: Describe			
Are there any discharges occurring at the time of inspection? <input type="checkbox"/> Yes <input type="checkbox"/> No If yes, describe: Describe			

Control Measures

- *Number the structural stormwater control measures identified in your SWPPP on your site map and list them below (add as many control measures as are implemented on-site). Carry a copy of the numbered site map with you during your inspections. This list will ensure that you are inspecting all required control measures at your facility.*
- *Identify if maintenance or corrective action is needed.*
 - *If maintenance is needed, fill out section B of this template*
 - *If corrective action is needed, fill out section G of this template*

	Structural Control Measure	Control Measure is Operating Effectively?	If No, In Need of Maintenance, Repair, or Replacement?	Maintenance or Corrective Action Needed and Notes
1	Insert Control Measure Name	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Maintenance <input type="checkbox"/> Repair <input type="checkbox"/> Replacement	Describe Maintenance and/or Corrective Actions Needed
2	Insert Control Measure Name	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Maintenance <input type="checkbox"/> Repair <input type="checkbox"/> Replacement	Describe Maintenance and/or Corrective Actions Needed
3	Insert Control Measure Name	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Maintenance <input type="checkbox"/> Repair <input type="checkbox"/> Replacement	Describe Maintenance and/or Corrective Actions Needed
4	Insert Control Measure Name	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Maintenance <input type="checkbox"/> Repair <input type="checkbox"/> Replacement	Describe Maintenance and/or Corrective Actions Needed
5	Insert Control Measure Name	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Maintenance <input type="checkbox"/> Repair <input type="checkbox"/> Replacement	Describe Maintenance and/or Corrective Actions Needed
6	Insert Control Measure Name	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Maintenance <input type="checkbox"/> Repair <input type="checkbox"/> Replacement	Describe Maintenance and/or Corrective Actions Needed
7	Insert Control Measure Name	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Maintenance <input type="checkbox"/> Repair <input type="checkbox"/> Replacement	Describe Maintenance and/or Corrective Actions Needed

	Structural Control Measure	Control Measure is Operating Effectively?	If No, In Need of Maintenance, Repair, or Replacement?	Maintenance or Corrective Action Needed and Notes
8	Insert Control Measure Name	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Maintenance <input type="checkbox"/> Repair <input type="checkbox"/> Replacement	Describe Maintenance and/or Corrective Actions Needed
9	Insert Control Measure Name	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Maintenance <input type="checkbox"/> Repair <input type="checkbox"/> Replacement	Describe Maintenance and/or Corrective Actions Needed
10	Insert Control Measure Name	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Maintenance <input type="checkbox"/> Repair <input type="checkbox"/> Replacement	Describe Maintenance and/or Corrective Actions Needed

Areas of Industrial Materials or Activities Exposed to Stormwater

Below are some general areas that should be assessed during routine inspections. Customize this list as needed for the specific types of industrial materials or activities at your facility that are potential pollutant sources. Identify if maintenance or corrective action is needed. If maintenance is needed, fill out section B of this template. If corrective action is needed, fill out section G of this template.

	Area/Activity	Inspected?	Controls Adequate (appropriate, effective and operating)?	Maintenance or Corrective Action Needed and Notes
1	Material loading/unloading and storage areas	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No	Describe Maintenance and/or Corrective Actions Needed
2	Equipment operations and maintenance areas	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No	Describe Maintenance and/or Corrective Actions Needed
3	Fueling areas	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No	Describe Maintenance and/or Corrective Actions Needed

	Area/Activity	Inspected?	Controls Adequate (appropriate, effective and operating)?	Maintenance or Corrective Action Needed and Notes
4	Outdoor vehicle and equipment washing areas	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No	Describe Maintenance and/or Corrective Actions Needed
5	Waste handling and disposal areas	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No	Describe Maintenance and/or Corrective Actions Needed
6	Erodible areas/construction	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No	Describe Maintenance and/or Corrective Actions Needed
7	Non-stormwater/ illicit connections	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No	Describe Maintenance and/or Corrective Actions Needed
8	Salt storage piles or pile containing salt	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No	Describe Maintenance and/or Corrective Actions Needed
9	Dust generation and vehicle tracking	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No	Describe Maintenance and/or Corrective Actions Needed
10	Processing areas	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No	Describe Maintenance and/or Corrective Actions Needed
11	Areas where industrial activity has taken place in the past and significant materials remain and are exposed to storm water	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No	Describe Maintenance and/or Corrective Actions Needed
12	Immediate access roads and rail lines used or traveled by carriers of raw materials,	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No	Describe Maintenance and/or Corrective Actions Needed

	Area/Activity	Inspected?	Controls Adequate (appropriate, effective and operating)?	Maintenance or Corrective Action Needed and Notes
	manufactured products, waste material, or by-products used or created by the facility			
13	(Other)	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No	Describe Maintenance and/or Corrective Actions Needed
14	(Other)	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No	Describe Maintenance and/or Corrective Actions Needed

Discharge Points

At discharge points, describe any evidence of, or the potential for, pollutants entering the drainage system. Also describe observations regarding the physical condition of and around all outfalls, including any flow dissipation devices, and evidence of pollutants in discharges and/or the receiving water. Identify if any corrective action is needed.

Describe Discharge Points Observations

Non-Compliance

Describe any incidents of non-compliance observed and not described above:

[Describe Non-compliance](#)

Additional Control Measures

Describe any additional control measures needed to comply with the permit requirements:

[Describe Additional Controls Needed](#)

Notes

Use this space for any additional notes or observations from the inspection:

[Additional Notes](#)

CERTIFICATION STATEMENT

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Print name and title: _____

Signature: _____ **Date:** _____

Quarterly Visual Assessment Reports

Instructions:

- Include in your records copies of all quarterly visual assessment reports completed for the facility (Part 3.2.2). An example quarterly visual assessment report can be found on the following page.

MSGP Quarterly Visual Assessment Form

(Complete a separate form for each outfall you assess)

Name of Facility: **Name of Facility**

NPDES Tracking No. **Insert Tracking No.**

Outfall Name: **Name** "Substantially Identical Discharge Point"? ☐ Yes **(identify substantially identical outfalls):**
☐ No

Person(s)/Title(s) collecting sample: **Name/Title**

Person(s)/Title(s) examining sample: **Name/Title**

Date & Time Discharge Began:
Enter date and time

Date & Time Sample Collected:
Enter date and time. If sample not taken within first 30 minutes, explain why.

Date & Time Sample Examined:
Enter date and time

Substitute Sample? ☐ ☐ Yes **(identify quarter/year when sample was originally scheduled to be collected):**
No

Nature of Discharge: ☐ Rainfall ☐ Snowmelt

If rainfall: Rainfall Amount: **No of inches**

Previous Storm Ended > 72 ☐ ☐ No* **(explain):**
hours Yes
Before Start of This Storm?

Pollutants Observed

Color ☐ None ☐ **(describe):** _____
Other

Odor ☐ None ☐ Musty ☐ Sewage ☐ Sulfur ☐ Sour ☐ Petroleum/Gas
☐ Solvents ☐ Other **(describe):** _____

Clarity ☐ Clear ☐ Slightly Cloudy ☐ Cloudy ☐ Opaque ☐ Other

Floating Solids ☐ No ☐ Yes **(describe):** _____

Settled Solids** ☐ No ☐ Yes **(describe):** _____

Suspended Solids ☐ No ☐ Yes **(describe):** _____

Foam (gently shake sample) ☐ No ☐ Yes **(describe):** _____

Oil ☐ None ☐ Flecks ☐ Globs ☐ Sheen ☐ Slick
Sheen ☐ Other (describe): _____

Other Obvious ☐ No ☐ Yes (describe): _____
Indicators of
Stormwater Pollution

* The 72-hour interval can be waived when the previous storm did not yield a measurable discharge or if you are able to document (attach applicable documentation) that less than a 72-hour interval is representative of local storm events during the sampling period.

** Observe for settled solids after allowing the sample to sit for approximately one-half hour.

Identify probably sources of any observed stormwater contamination. Also, include any additional comments, descriptions of pictures taken, and any corrective actions necessary below (attach additional sheets as necessary). [Insert details](#)

Certification Statement (Refer to MSGP Subpart 11 Appendix B for Signatory Requirements)

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

A. Name:

B.
Title:

C.
Signature:

D. Date
Signed:

Deviations from assessment or monitoring schedule

Instructions:

Include in your records:

- A description of any deviations from the schedule you provided in your SWPPP for visual assessments and/or monitoring (Part 4.1), and
- The reason for the deviations (e.g., adverse weather or it was impracticable to collect samples within the first 30 minutes of a measurable storm event).

Use the fields below to document the deviations. Repeat as necessary for any deviations.

Date: [Insert Date](#)

☐ Visual assessments

☐ Monitoring

Describe deviation from schedule: [Describe deviation](#)

Reason for deviation: [Describe reason](#)

Date: [Insert Date](#)

☐ Visual assessments

☐ Monitoring

Describe deviation from schedule: [Describe deviation](#)

Reason for deviation: [Describe reason](#)

Date: [Insert Date](#)

☐ Visual assessments

☐ Monitoring

Describe deviation from schedule: [Describe deviation](#)

Reason for deviation: [Describe reason](#)

Date: [Insert Date](#)

☐ Visual assessments

☐ Monitoring

Describe deviation from schedule: [Describe deviation](#)

Reason for deviation: [Describe reason](#)

Corrective Action Documentation

Instructions:

Within 24 hours of becoming aware of a condition identified in Parts 5.1 of the 2021 MSGP, document the existence of the condition and subsequent actions. Note that this information must be summarized in the annual report (as required in Part 7.5 of the 2021 MSGP).

Description of Condition: [Insert description of condition triggering the need for corrective action](#)

For Spills and Leaks:

Description of Incident: [Insert Description](#)

Material: [Insert description of material](#)

Date/Time: [Insert Date/Time](#)

Amount: [Insert Estimated Amount of Spill/Leak](#)

Location: [Insert Location of Spill/Leak](#)

Reason for Spill: [Insert Reason for Spill/Leak](#)

Discharge to Waters of U.S.: [Insert Whether Spill/Leak discharged to a Water of the U.S.](#)

Date: [Insert Date Condition was Identified](#)

Immediate Actions: [Insert Description of Immediate Actions Taken](#)

Actions Taken within 14 Days: [Insert Description of Actions Taken within 14 days of discovery](#)

14 Day Infeasibility: [If Applicable, document why it is infeasible to complete necessary installations or repairs within 14-day timeframe and describe schedule](#)

45 Day Extension: [If Applicable, document rationale sent to EPA for extension of 45 day timeframe](#)

Description of Condition: [Insert description of condition triggering the need for corrective action](#)

For Spills and Leaks:

Description of Incident: [Insert Description](#)

Material: [Insert description of material](#)

Date/Time: [Insert Date/Time](#)

Amount: [Insert Estimated Amount of Spill/Leak](#)

Location: Insert Location of Spill/Leak

Reason for Spill: Insert Reason for Spill/Leak

Discharge to Waters of U.S.: Insert Whether Spill/Leak discharged to a Water of the U.S.

Date: Insert Date Condition was Identified

Immediate Actions: Insert Description of Immediate Actions Taken

Actions Taken within 14 Days: Insert Description of Actions Taken within 14 days of discovery

14 Day Infeasibility: If Applicable, document why it is infeasible to complete necessary installations or repairs within 14-day timeframe and describe schedule

45 Day Extension: If Applicable, document rationale sent to EPA for extension of 45 day timeframe

SWPPP Amendment Log

Instructions:

Include in your records:

- A log of the date and description of any amendments to your SWPPP.

Fill in the appropriate columns of this table for each amendment to your SWPPP. Copy and paste additional rows into the table as necessary.

Amend. No.	Description of the Amendment	Date of Amendment	Amendment Prepared by [Name(s) and Title]
1	Insert description of amendment	Insert date	Insert name/title
2	Insert description of amendment	Insert date	Insert name/title
3	Insert description of amendment	Insert date	Insert name/title
4	Insert description of amendment	Insert date	Insert name/title
5	Insert description of amendment	Insert date	Insert name/title
6	Insert description of amendment	Insert date	Insert name/title
7	Insert description of amendment	Insert date	Insert name/title
8	Insert description of amendment	Insert date	Insert name/title
9	Insert description of amendment	Insert date	Insert name/title
10	Insert description of amendment	Insert date	Insert name/title
11	Insert description of amendment	Insert date	Insert name/title

APPENDIX G

THREATENED AND ENDANGERED SPECIES ACT DOCUMENTATION

