

INSPECTION REPORT

Inspection Entry Date/Time	12/18/2024 08:28 AM (PT)	Announced: No	
Inspection Exit Date/Time	12/18/2024 11:45 AM (PT)	Access: Granted	
Weather	50°F, Overcast		
Media	Water		
Statute(s)/Program(s)	Clean Water Act, NPDES, Stormwater – Industrial		
Type of Inspection	Compliance Evaluation Inspection		
Permittee Name	Granite Excavation		
Site Name	Kuna Mora Pit aka Blacks Creek Pit		
Site Physical Address	East Kuna Mora Road		
City, State, Zip Code	Kuna, Idaho 83634		
County	Ada		
Facility GPS Coordinates	43.468100, -116.166400		
Mailing Address	23 Warm Lake Highway		
City, State, Zip Code	Cascade, Idaho 83611		
FRS ID	IDT7827185999		
Permit Number	IDR05J10R		
SIC	1442 (Construction sand & gravel mining)		
Lead Inspector:			
RAYMOND ANDREWS		Digitally signed by RAYMOND ANDREWS Date: 2025.02.10 09:14:09 -08'00'	
Raymond Andrews	EPA Region 10	andrews.raymond@epa.gov	(206) 553-4252
Supervisor Review:			
Contreras, Peter		Digitally signed by Contreras, Peter Date: 2025.02.10 12:15:14 -08'00'	
Peter Contreras	EPA Region 10	contreras.peter@epa.gov	(206) 553-6708

SECTION I – Opening Conference

I arrived at the Granite Excavation site (“Site”), located at East Kuna Mora Road, Kuna, Idaho, at 8:28 AM on 12/18/2024 for an unannounced inspection. I presented my credentials to Jack Nygaard, Syman Consultant, and informed him I was there to conduct an inspection to determine compliance with the Clean Water Act (CWA) and the site’s National Pollutant Discharge Elimination System (NPDES) Multi-Sector General Permit (MSGP) For Stormwater Discharges Associated with Industrial Activity, permit # IDR05J10R. This report is based on information supplied by Mr. Jack Nygaard, my direct observations, and records and reports maintained by the permittee. In addition, information gathered prior to or after the Inspection from a review of EPA, State, and/or public records may be included in this report.

Granite Excavation shares the site with Lurre Construction (IDR05J10O) and they use the same consultant, Syman Company, to manage stormwater. Granite Excavation operates from the upper portion of the Site.

Syman specializes in providing stormwater compliance solutions for various industries and produced a single Stormwater Pollution Prevention Plan (SWPPP) for the site which encompasses both Granite’s and Lurre’s activities. In addition to writing the site’s SWPPP, Syman maintains the Best Management Practices (BMPs), conducts routine site inspections, and conducts sampling.

Attendees

Organization	Attendee Name	Title	Present in Opening Conf.	Present in Closing Conf.
EPA Region 10	Raymond Andrews	Lead Inspector	Yes	Yes
Syman Erosion & Sediment Control	Jack Nygaard	MSGP Project Manager	Yes	Yes
Granite Excavation	Michelle Valona	SWPPP Inspector	Yes	Yes

Site Information

Responsible Official?	Dusty Hibbard, Vice President; Michelle Brewer, SWPPP Inspector
Type of Operation	Mineral Mining and Processing
Is property owned?	The property is leased from the Idaho Department of Land.
Size of Site?	The total size of the site is approximately 110 acres.
Years in Operation?	Granite Excavation started operations around February 1, 2023.
Number of Employees?	The site has three to five employees.
Hours/Days of Operations?	The site is operational 7AM – 5 PM, Monday through Friday. Some weekends are worked during peak construction season.
Industrial activities exposed to stormwater?	The site excavates raw material, crushes it, then sorts and loads it for shipping.
Type of materials and/or vehicles stored outdoors?	Construction aggregates, loaders, bulldozers, excavators, dump trucks, crushers, and power sorters are all stored outside.
Number of Outfalls?	The site has two outfalls, Outfall 001 and Outfall 002. The site does not have any inlets or drains.
Sampling locations?	The site’s discharges are sampled at Outfall 001 and Outfall 002.

Personnel conducting inspections/sampling?	Jack Nygaard, the Syman Consultant, conducts inspections and sampling.
How often does the site conduct sampling?	Mr. Nygaard conducts quarterly sampling.
Does the site analyze water samples in-house?	All water samples are analyzed by a contract lab.
What is the contract lab's contact information?	Analytical Laboratories, Inc. 1804 N 33 Road Boise, Idaho 83703 (208) 342-5515
Receiving Water?	The receiving water is Tenmile Creek which is a 3rd order stream below Blacks Creek Reservoir.
Describe stormwater's flow path across the site.	Stormwater flows downslope, from north to south in the southern portion of the property. It flows from south to north at the northern portion of the property.
BMPs/Stormwater Treatment?	The facility uses available topsoil from clearing and grubbing to create topsoil berms at the facility's limits of disturbance to prevent stormwater discharges from leaving the facility. Overburden is stockpiled on the south end of the project limits, since the southern portion of the site receives heavy stormwater flows from up slope. The subgrade material is very porous, and stormwater infiltrates into the ground or evaporates. Other BMPs include secondary containments for fuel storage, which are double walled tanks.

SECTION II – Observations

No observations were made that constitute an Area of Concern.

SECTION III – Records Review

Records may not be in sequential order.

Record: SWPPP		AOC: Yes
Ref #: RA1-RR-006	Reviewed By: Raymond Andrews	Reviewed Date: 01/24/2025
Post inspection, I reviewed the Site's Stormwater Pollution Prevention Plan (SWPPP) with a preparation date of July 7, 2022. Syman, LLC is the consultant that created the SWPPP. Syman also does all the inspections and sampling required by the permit. Syman is the consultant for both Lurre Construction (IDR05J10O) and Granite Excavation (IDR05J10R) which share the site. Since it is a single site, Syman prepared one SWPPP that covers activities of each entity on the site. The SWPPP has entries specific to each operational entity as it applies, but a majority of the SWPPP addresses the site as a whole. The only areas of concern I found with the SWPPP are missing elements of the Site Map. The SWPPP map is required to use arrows to show the direction of stormwater flow. While the map does have arrows, there is nothing on the map, or in the Legend, explaining what the arrows represent. The Site Map showed the location of the two outfalls on the site, but it did not show the location of the sampling points. If the outfalls are the sampling points, the map should indicate that is the case.		

Record: DMR Reports		AOC: No
Ref #: RA1-RR-005	Reviewed By: Raymond Andrews	Reviewed Date: 01/24/2025
Post inspection, I reviewed Discharge Monitoring Reports (DMRs) from 4Q 2023 through 3Q 2024. I did not note any areas of concern.		
Record: Other - Site Routine Inspection Reports		AOC: No
Ref #: RA1-RR-004	Reviewed By: Raymond Andrews	Reviewed Date: 01/24/2025
Post inspection, I reviewed the Site's Routine Inspection Reports from 1Q 2023 through 4Q 2024. I did not note any areas of concern.		
Record: Other - Site Annual Reports		AOC: No
Ref #: RA1-RR-003	Reviewed By: Raymond Andrews	Reviewed Date: 12/13/2024
Post inspection, I reviewed two of the Site's Annual Reports. The Site became active in 4Q 2022. I reviewed Annual Reports for reporting years 2022 and 2023. I did not note any areas of concern.		
Record: Notice of Intent		AOC: No
Ref #: RA1-RR-002	Reviewed By: Raymond Andrews	Reviewed Date: 12/13/2024
Prior to the inspection, I reviewed the site's Notice of Intent (NOI) to discharge, dated September 22, 2022. I did not note any areas of concern.		
Record: Other - ICIS Benchmark Report		AOC: No
Ref #: RA1-RR-001	Reviewed By: Raymond Andrews	Reviewed Date: 12/13/2024
Prior to the inspection, I reviewed a benchmark report generated from EPA's Integrated Compliance Information System (ISICIS) database. The report was provided by Jason Rodrigues and retrieved from the database on December 11, 2024.		
The report covered the four quarters of 2024. The report showed the site did not report any benchmark exceedances for the year.		

SECTION IV – Sampling Activities

No sampling was conducted.

SECTION V – Areas of Concern

Areas of Concern may not be in sequential order.

The presentation of Area(s) of Concern does not constitute a formal compliance determination or violation.

AOC Reference #: RA1-RR-006	Records Review: SWPPP
Permit Requirement Part 6.2.2.3 of the Permit states the SWPPP must provide a map showing, in part, "c. Directions of stormwater flow (use arrows), including flows with a significant potential to cause soil erosion...i. Locations of all stormwater monitoring points..."	
AOC: There is nothing on the map explaining what the arrows represent. The Site Map did not show the location of the sampling points.	

SECTION VI – Closing Conference

I held a closing conference with Site personnel at 11:45 AM (PT) on 12/18/2024 for the inspection. During the closing conference, I discussed my observations and Areas of Concern identified during the inspection. Observations and Areas of Concern have not yet been evaluated for a formal compliance determination.

SECTION VII – List of Appendices

1. Photo Log

APPENDIX 1: Photo Log



Berm			IMG-202412180941444144138914.jpg
12/18/2024 09:41 AM	No CBI	No PII	Photographer: Raymond Andrews
43.46518186, -116.16541577			
Active Site Perimeter Berm, Vegetated Buffer Zone, and Bark Wattle Delineating the Outer Boundary of the Site.			



Berm			IMG-202412180941474147130497.jpg
12/18/2024 09:41 AM	No CBI	No PII	Photographer: Raymond Andrews
43.46518186, -116.16541577			
Active Site Perimeter Berm along Access Road, photo 1			



Berm			IMG-202412180941514151135534.jpg
12/18/2024 09:41 AM	No CBI	No PII	Photographer: Raymond Andrews
43.46518064, -116.16541726			
Active Site Perimeter Berm along Access Road, photo 2			



Conveyor			IMG-20241218094312431287636.jpg
12/18/2024 09:43 AM (MT)	No CBI	No PII	Photographer: Raymond Andrews
43.46518064, -116.16541726			
Conveyor piling sand			



Upper Site			IMG-20241218094642464293212.jpg
12/18/2024 09:46 AM	No CBI	No PII	Photographer: Raymond Andrews
43.46568059, -116.16733332			
Site bounded by Hills, photo 1			



Upper Site			IMG-20241218094651465193241.jpg
12/18/2024 09:46 AM	No CBI	No PII	Photographer: Raymond Andrews
43.46568059, -116.16733332			
Site bounded by Hills, photo 2			



Upper Site			IMG-20241218094658465897554.jpg
12/18/2024 09:46 AM	No CBI	No PII	Photographer: Raymond Andrews
43.46568059, -116.16733332			
Site bounded by Hills, photo 3			



Outer Site Boundary			IMG-202412180954485448148815.jpg
12/18/2024 09:54 AM	No CBI	No PII	Photographer: Raymond Andrews
43.46568059, -116.16733332			
Bark wattle acting as limit of active site, photo 1			



Outer Site Boundary			IMG-202412180954505450137977.jpg
12/18/2024 09:54 AM	No CBI	No PII	Photographer: Raymond Andrews
43.46568059, -116.16733332			
Bark wattle acting as limit of active site, photo 2			



Outer Site Boundary			IMG-202412180956455645101834.jpg
12/18/2024 09:56 AM	No CBI	No PII	Photographer: Raymond Andrews
43.46568059, -116.16733332			
Active Site Perimeter Berm along Access Road, photo 3			



Site Entrance Sign			IMG-2024121810081381383215.jpg
12/18/2024 10:08 AM	No CBI	No PII	Photographer: Raymond Andrews
43.46568059, -116.16733332			
Site Entrance Sign with SWPPP, Photo 1			



Site Entrance Sign			IMG-2024121810083883866724.jpg
12/18/2024 10:08 AM	No CBI	No PII	Photographer: Raymond Andrews
43.46568059, -116.16733332			
Site Entrance Sign with SWPPP, Photo 2			