

Clean Water Act (CWA) Inspection Report

Inspection Entry Date/Time	05/23/2024 8:40 AM (PST)	Announced: No		
Inspection Exit Date/Time	05/23/2024 12:40 PM (PST)	Access: Granted		
Weather	Cloudy, 41° F			
Media/Statute(s)/Program(s)	Water, Clean Water Act, NPDES, Industrial Stormwater			
Type of Inspection	CEI - Compliance Evaluation Inspection			
Facility Name	Idaho Forest Group LLC – Grangeville			
Physical Address	171 Highway 95 North			
City/State/Zip Code	Grangeville, Idaho 83530			
County	Idaho County			
Facility GPS Coordinates	45. 941 N -116.1457 W			
Facility Mailing Address	171 Highway 95 North			
City/State/Zip Code	Grangeville, Idaho 83530			
FRS ID	110013286390			
EPA Permit Tracking #	IDR053246			
Inspection Contacts:				
Organization	Name	Title	Present in Opening Conf.	Present in Closing Conf.
EPA Region 10	Jon Klemesrud	Lead Inspector	Yes	Yes
Idaho Forest Group LCC	Eric Smith	Plant Superintendent	Yes	Yes
Idaho Forest Group LLC	Necole Taylor	Stormwater Technician	Yes	Yes
Idaho Forest Group LLC	Fred Smith	Maintenance Manager	Yes	Yes
Idaho Forest Group LLC	Jim Miller	Technical Manager	No	Yes
EPA Inspector Signature/Date	JON KLEMESRUD		Digitally signed by JON KLEMESRUD Date: 2024.07.29 17:23:35 -07'00'	
	Jon Klemesrud, FDDWES			
Supervisor Signature/Date	PETER CONTRERAS		Digitally signed by PETER CONTRERAS Date: 2024.07.30 07:56:51 -07'00'	
	Peter Contreras, Chief FDDWES			

This inspection report is based on information supplied by conversations with Mr. Eric Smith, Ms. Necole Taylor, Mr. Fred Smith, Mr. Jim Miller, or direct observations made at the time of the inspection. This inspection report may also include information gathered from a review of EPA/Idaho Department of Environmental Quality (IDEQ) files and/or public records.

SECTION I – INTRODUCTION

Facility Description

Idaho Forest Group - Grangeville (hereinafter referred to as the “Facility”) is one of five operating lumber sawmills in Idaho owned and operated by Idaho Forest Group LLC (IFG). The Facility located on 260 acres north of U.S. Highway 95, along the western edge of Grangeville, Idaho. See **Attachment A**, Aerial Image (Google Earth®).

The property has been used for sawmill operations by various owners since 1968 (approx.) and was purchased by IFG in 2005. According to the company’s website (*ifg.com*), the Facility is “designed with exceptional flexibility to make a multitude of products, producing up to 250 million board feet per year for the world market. The mill produces 2x3 through 2x6 high quality dimensional lumber up to 16 feet in length. Primarily from Douglas Fir and White Fir, with smaller amounts of Larch, Lodgepole Pine and Engelmann Spruce, as well as cedar in 2x4, 2x6 and 5/4x6 decking. The plant sells chips, sawdust, hog fuel and shavings to regional pulp and paper producers, horse bedding suppliers, decorative bard producers and wood pellet manufacturers.”

There are approximately 180 employees at the Facility, operating two separate nine-hour shifts, five days per week. Operations generally include log receiving, log handling and storage, log debarking, saw milling and planing, kiln drying, finished lumber storage and shipping. Industrial areas and material storage areas include the sawmill, log yard, boiler, drying kilns, planer mill, vehicle and maintenance shop, wash rack and rock quarry.

Permit Information

The Facility is permitted to discharge stormwater to the West Fork of Long Haul Creek (Cottonwood Creek Watershed, tributary to the South Fork Clearwater River) under the National Pollutant Discharge Elimination System (NPDES) 2021 Multi-Sector General Permit for Stormwater Discharges Associated with Industrial Activity (MSGP). The 2021 MSGP became effective on March 1, 2021, and is set to expire on February 28, 2026. The NPDES tracking number issued to the Facility for MSGP coverage is IDR053246. Long Haul Creek runs along the western, eastern, and northern portions of the Facility. The Facility directs stormwater into a large holding pond north of the Facility and controls discharges to Long Haul Creek via a single outfall located along the northwest end of the pond.

Permitting authority was transferred from EPA Region 10 to Idaho Department of Environmental Quality (IDEQ) on July 1, 2021, as IDEQ became the delegated authority for General NPDES Stormwater Permits under Phase IV of the scheduled transfer. Prior to the 2021 MSGP, the Facility was covered under the previous version of the permit, the 2015 EPA MSGP.

As the Facility’s industrial activity falls under the standard industrial classification (SIC) code 2421, (General Sawmills and Planning Mills), the Facility is subject to the additional requirements of Part 8, Subpart A, Sector A1 (Timber Products), including sector-specific benchmark monitoring for Chemical Oxygen Demand (COD), Total Suspended Solids (TSS), Total Recoverable Zinc, Total Inorganic Nitrogen, and Total Phosphorus.

Part 8, Subpart A, Sector A1 of the 2021 MSGP also established annual effluent limitation monitoring for pH and Debris (woody material such as bark, twigs, branches, heartwood, or sapwood) for discharges resulting from spray down or intentional wetting of logs at wet deck storage areas. IDEQ has established Total Daily Maximum Loads (TMDLs) for the Cottonwood Creek Watershed, including a value lower than the sector specific benchmark

for TSS. See **Attachment B**, EPA 2021/2017 Additional Monitoring Requirements Letters.

Entry and Inspection Chronology

This was an unannounced inspection by EPA Region 10; IDEQ was invited to participate in the inspection but was not in attendance. The inspection consisted of an opening conference, a walk-through of the Facility, a records review, and concluded with a closing conference. During the closing conference I discussed my observations, potential compliance concerns and EPA's general compliance review process. Photographs taken during the inspection are attached to this inspection report as **Attachment C**, Photograph Log.

On the day of the inspection, I arrived at the Facility's main office and was greeted by Mr. Eric Smith, Plant Superintendent. I introduced myself and discussed that I had been asked to conduct a routine NPDES compliance inspection regarding the Facility's coverage under the MSGP. Mr. E. Smith welcomed the inspection and invited me into the Facility's conference room. Mr. E. Smith discussed that he would notify the appropriate Facility staff members of my arrival so they could join us in the conference room, and we could begin the inspection.

A few moments later, Mr. E. Smith and I were joined in the conference room by Facility Stormwater Technician, Ms. Necole Taylor, and Facility Maintenance Manager, Mr. Fred Smith. We had initial introductions as a group, and I presented my EPA inspector credentials and restated the purpose and scope of the inspection. I also provided a copy of EPA's Small Business Resources Information Sheet and EPA Industrial Stormwater Fact Sheet associated with "Timber Product Facilities." During our introductions, it was discussed that each Facility representative present was generally familiar/involved with implementation of the MSGP requirements at the Facility. Ms. Taylor is the primary contact regarding benchmark/effluent monitoring and routine site inspections required by the permit.

It was discussed that IFG's Technical Manager, Mr. Jim Miller, was also notified of the inspection activity by Mr. E. Smith and would be joining us later during the inspection. Mr. Miller was previously staffed at the Grangeville location but had recently transitioned to new position within IFG and is now based in Lewiston, Idaho. It was discussed that the Facility also utilizes Keltic Engineering, Inc. for various permit related items including Stormwater Pollution Prevention Plan (SWPPP) development.

Following introductions, Mr. E. Smith provided a brief history on the Facility as well as a general background of day-to-day operations. It was discussed that the Facility continues to exceed the benchmark for Total Phosphorus. Based upon upstream sampling data conducted by the Facility, the Facility believes that the Total Phosphorus exceedances are at least partly due to elevated background levels within Long Haul Creek.

Mr. E. Smith explained that the Facility has tried to be pro-active in addressing the exceedances, as they have adopted a new discharge schedule as they are attempting to only discharge seasonally, during the first two quarters of each year. Eight aerators were recently purchased and installed within the stormwater pond as well as a land application pump and sprinkler system to the north. The Facility has also modified their boiler ash storage area to minimize exposure. It was discussed that the Facility was also exploring purchasing the adjacent lot to the northwest, which could extend their discharge/outfall location and allow for additional BMPs as well as more representative sample of the Facility's impact to Long Haul Creek.

It was discussed that during summer months, the Facility utilizes water from the stormwater pond for application to the wet deck/log storage area. Prior to 2021, the Facility also utilized well water for application to the wet deck/log storage area but has since switched exclusively to water from the stormwater pond.

To assist in orienting me with the Facility's layout, Mr. E. Smith brought in a large Facility Map (**Photo 1**) to review/discuss. After a brief review, we began the walk-through just north of the main office and parking area. I was accompanied throughout the inspection/walk-through by Mr. E. Smith, Ms. Taylor, and Mr. F. Smith. Mr. Miller joined the inspection for the records review and closing conference.

SECTION II – OBSERVATIONS

Site Review

As discussed earlier in this report, industrial areas at the Facility generally include material storage areas, the sawmill areas, log yard, boiler, drying kilns, planer mill, vehicle and maintenance shop, wash rack and rock quarry. Activities exposed to stormwater generally include log handling and storage, equipment and vehicle operation, boiler ash disposal, lumber storage, above ground fueling and storage areas, chipper and bark removal and the sawmill area.

The Facility has identified potential pollutant sources to stormwater to include wood debris, leachate, TSS, COD, BOD, petroleum hydrocarbons, acids, metals, suspended particulates from dirt and wood materials, tannins/lignin from wood and bark, hydraulic oil spills from vehicle travel.

Examples of best management practices (BMPs) adopted by the Facility include but not limited to minimizing exposure, good housekeeping, routine sweeping, preventive maintenance of vehicles/equipment, on-site inspections, berming and ditching, seasonal discharging with plans for land application. The Facility has also constructed a forebay berm within their stormwater pond to promote settling. Water from the Facility's wash rack is collected and routed to sanitary sewer.

Walk-Through Observations:

Location: Parking and Entrance Area, Southeast Perimeter

Observation #: OB-001

We first observed the paved parking and entrance area north of the main office. The paved areas are generally sloped to the west, routing stormwater to an engineered drainage channel that travels along the southwestern perimeter (**Photo 2**). The drainage channel then enters subsurface piping, routing stormwater to the stormwater pond and avoiding the industrial areas on the property. The large parking area as well as the areas east of the truck entrance appeared to be well maintained and free of debris (**Photo 3**). Northeast of the entrance/log scale, we observed a catch basin inlet within the entrance area routing stormwater to the stormwater pond via subsurface piping (**Photo 4**). The general area was well maintained and free of debris.

We continued east along the southern perimeter and observed the southern end of the log deck/storage area. A large earthen berm was constructed along the southern and eastern perimeter (**Photo 5, Photo 6**). In general, stormwater is designed to be contained within the log yard and either evaporated, infiltrated, or routed to the Facility's stormwater pond.

Location: Central Areas (Mill, Fueling, Lumber Storage, Truck Shop)

Observation #: OB-002

We continued north into the central areas of the Facility, west of log yard. We observed a central drainage channel located north of the Log Yard Office (**Photo 7**). The central drainage channel routes stormwater from the western perimeter of the log yard away from the fueling area and access road (**Photo 8**). Stormwater then flows back south, away from the mill area and into a central catch basin located north of the fueling area (**Photo 9**). It was discussed that all catch basins connect to the subsurface piping system and then into the Facility's stormwater pond.

South of the mill, we also observed the sawdust and chip bin. According to Mr. E. Smith, approximately 33 loads are hauled each day, the Facility contracts with Baker Trucking and has 5 trucks operating.

We observed the fueling area which consists of a covered 15,000-gallon fuel tank with secondary containment. The 15,000-gallon tank/fueling area provides on-site fueling of “off-road diesel.” There is also a smaller unleaded gas tank mounted within the containment area. The Facility maintains a spill kit within the areas as well as a Spill Prevention Control, and Countermeasure (SPCC) Plan.

We then continued southeast of the mill to the southern areas of the “green yard.” We observed one catch basin within the area (**Photo 10**). Within the “green yard,” freshly cut “green lumber” from the mill is stored prior to entering the kilns (**Photo 11**).

We observed designated wash bay and associated drying bed. It was discussed that the wash bay routes wash water to sanitary sewer. North of the wash bay, we observed the Facility’s Tymco vacuum sweeper truck (**Photo 12**), it was discussed that the Facility maintains a clean-up crew for the property, generally operating weekly or as needed.

Location: Boiler Area, Northwest Log Yard

Observation #: OB-003

Following our time near the lumber storage area and maintenance area, we headed toward the boiler building. This north end of the property transitions to an unpaved surface. We observed a central catch basin between the lumber storage area and boiler building (**Photo 13, Photo 14**). It was discussed that the boiler was currently in a scheduled shut down for maintenance. The boiler utilizes a reverse osmosis (RO) system. West of the boiler, we observed a small containment area utilized for boiler ash cooling (**Photo 15**).

We then continued to the northwest corner of the property; we observed a stormwater collection area discharging to an initial stormwater channel prior to discharging to the stormwater pond (**Photo 16 – Photo 18**). We traveled east along the northwest log deck storage area (**Photo 19**); it was discussed that the log deck has several catch basins as well as channels that route stormwater downslope to the north. Stormwater is ultimately collected in a northern drainage channel (**Photo 20**), discharging to the stormwater pond via culverts. Stormwater from the northwest log yard is first routed to an initial settling pond prior to entering the larger/primary collection pond (**Photo 21 - Photo 23**).

Location: Stormwater Pond, Outfall, Northeast Log Yard

Observation #: OB-004

We arrived at the Facility’s primary stormwater collection pond (**Photo 24**) and discussed/observed the eight aerators that were operating. It was discussed that the aeration system recently installed within the pond approximately one month prior. We continued to the northwest corner where we observed the pond’s discharge to a vegetative area west of the pond (**Photo 25**) via culvert. The discharge point is considered the Facility’s Outfall 001 and was discharging at the time of inspection. The discharge was slightly turbid with no floating debris. It was discussed that the ponds discharge/culvert is the monitoring point for permit compliance. The discharge then meanders within the vegetative area before entering the receiving water (Long Haul Creek) approximately 300-400 yards to the northwest. Mr. E. Smith discussed that the vegetative area was on private property owned by an adjacent landowner and that the Facility was exploring purchasing the lot.

We then travelled to the north side of the pond and observed the newly installed pump station (**Photo 26**). The pump station was installed to provide the option for land application to a vegetative field north of the Long Haul Creek (**Photo 27**).

We continued to the east end of the pond and observed additional influent sources from the log deck collection system (**Photo 28**). We also observed the constructed forebay berm within the pond (**Photo 29**).

We then travelled to the northeast corner of the site and observed Long Haul Creek, flowing north along the property boundary near the Facility's screening/sorting pile (**Photo 30, Photo 31**). A slight berm is located between the property and Long Haul Creek along the eastern perimeter. No stormwater was observed entering Long Haul Creek. Due to the short distance between the Facility's screening/sorting pile and Long Haul Creek, I suggested the Facility consider some additional BMPs at this location to ensure no direct discharge from the area.

We then continued back to the log yard and observed a stormwater collection channel within the northeastern corner (**Photo 32, Photo 33**). The channel directs stormwater from the log yard to the primary collection pond.

Location: Western Perimeter

Observation #: OB-005

We continued from the eastern perimeter back to the western perimeter near the fabrication building to observe West Fork of Long Haul Creek which runs adjacent to the Facility (**Photo 34**). Berming extends along the western perimeter as well as a vegetative area that is maintained with irrigation (**Photo 35**). We continued south and observed the planer mill area and associated sawdust/shaving/chip bins (**Photo 36**). We then observed where the parking lot drainage channel observed earlier in the inspection enters the below ground stormwater collection system (**Photo 37**). The walk-through concluded after viewing the MSPG permit coverage signage (**Photo 38**) located along the Highway, southwest of the pine building. We then returned to the Facility's conference room to begin the records review.

SECTION III – Records Review

The following records were reviewed as part of the inspection:

Record: Discharge Monitoring Reports (DMRs) & Laboratory Analytical Data

Ref #: RR-001

As discussed earlier within this report, the Facility is subject sector-specific benchmark monitoring for Chemical Oxygen Demand (COD), Total Suspended Solids (TSS), Total Recoverable Zinc, Total Inorganic Nitrogen, and Total Phosphorus. In addition, Part 8, Subpart A, Sector A1 of the 2021 MSGP also established annual effluent limitation monitoring for pH and Debris (woody material such as bark, twigs, branches, heartwood, or sapwood) for discharges resulting from spray down or intentional wetting of logs at wet deck storage areas.

Prior to the inspection, I reviewed quarterly DMR data submitted over the past 5-years (May 2019 – May 2024). This was also completed by a review of an exceedance report generated by EPA's Integrated Compliance Information System (ICIS). The review noted 11 benchmark exceedances for Total Phosphorus and 1 benchmark exceedance for TSS:

Quarter (Q):	Parameter:	Reported Value:	Benchmark Value:
Q1 2019	Total Phosphorus	0.276 mg/L	0.1 mg/L
Q3 2019	Total Phosphorus	0.26 mg/L	0.1 mg/L
Q2 2020	Total Phosphorus	0.463 mg/L	0.1 mg/L
Q3 2020	TSS	74 mg/L	50 mg/L
Q3 2020	Total Phosphorus	1.80 mg/L	0.1 mg/L
Q4 2020	Total Phosphorus	0.261 mg/L	0.1 mg/L
Q1 2021	Total Phosphorus	0.261 mg/L	0.1 mg/L
Q1 2022	Total Phosphorus	0.261 mg/L	0.1 mg/L
Q2 2022	Total Phosphorus	0.191 mg/L	0.1 mg/L
Q1 2023	Total Phosphorus	0.494 mg/L	0.1 mg/L
Q2 2023	Total Phosphorus	0.441 mg/L	0.1 mg/L
Q1 2024	Total Phosphorus	0.737 mg/L	0.1 mg/L

As discussed earlier in this report, the Facility has adopted a new discharge schedule as they are attempting to only discharge seasonally, during the first two quarters of each year. During summer months, the Facility utilizes water from the stormwater pond for application to the wet deck/log storage area.

It was discussed that benchmark and effluent monitoring samples are currently collected for each parameter required by Ms. Taylor. Samples are collected where the stormwater pond discharges via culvert to the vegetative area south of Long Haul Creek. Chain-of-custody documentation is completed, and samples are placed on ice prior to being hand delivered (same day) to Anatek Labs, Inc. in Moscow, Idaho. Analytical reports from Anatek Labs, Inc. are provided to the Facility and then uploaded to the corresponding DMR.

As discussed earlier in this report, based upon upstream sampling data conducted by the Facility, the Facility believes that the Total Phosphorus exceedances are at least partly due to elevated background levels within Long Haul Creek.

As a subsample, I reviewed analytical reports including chain-of-custody documentation from the following sampling events: March 22, 2022, May 3, 2022, April 12, 2023, March 5, 2024. It was also discussed that although only required annually, the Facility monitors for pH quarterly (when discharging).

Record: Stormwater Pollution Prevention Plan (SWPPP)

Ref #: RR-002

At the time of the inspection, I conducted a cursory review of the Facility's SWPPP that was prepared by Keltic Engineering, Inc. and was dated August 11, 2017. The SWPPP was then reviewed post-inspection after it was provided by Mr. E. Smith via email. The SWPPP was developed using the 2015 Industrial SWPPP template and appeared to meet the minimum requirements of the MSGP. No corrective action documentation was observed within the SWPPP.

Initially there was some confusion as the Facility also presented a copy of more recent SWPPP dated March 18, 2024, also prepared by Keltic Engineering, Inc. It was then discussed that the more recent SWPPP was prepared for future coverage under EPA's Construction General Permit. Mr. Miller discussed the Facility is currently drafting a permit application for future construction activities. It was discussed that the site map associated with CGP SWPPP could be also included with the MSGP SWPPP to address some recent/minimal site changes.

Stormwater training related to the SWPPP was also discussed at the time of inspection, training occurs both to new hires and annually via a corporate learning management system.

Site Inspection Reports, Visual Assessments & Annual Reports

Ref #: RR-003

At the time of inspection, I requested to review Quarterly Site Inspection Reports, Visual Assessments and Annual Report documentation over the past 5-years (May 2019 – May 2024). Site inspection reports and visual assessments are maintained within binders which are kept on-site. The documents are also uploaded along with the corresponding DMR. As discussed earlier in this report, documented site inspections and visual assessments are currently conducted by Ms. Taylor. Prior to taking his new position within IFG, Mr. Miller would also participate in/conduct the inspections and monitoring.

As a subsample, I reviewed site inspection reports and visual assessment documentation from the following sampling events: August 21, 2021, November 30, 2021, December 14, 2022, March 8, 2023, and March 5, 2024. Applicable Annual Reports (2019-2023) were also reviewed.

The records were generated using the MSGP templates and were well organized and well documented. For site inspections with instances of observed "no discharge," photographs were routinely taken of the pond and outfall providing a visual of pond levels associated to the outfall.

SECTION IV– SAMPLING ACTIVITIES AND ANALYTICAL RESULTS

No sampling was conducted for this inspection.

SECTION V - AREAS OF CONCERN

The presentation of Area(s) of Concern (AOC) does not constitute a formal compliance determination or violation. The following AOCs were identified as part of the inspection:

AOC Reference #: AOC-1**pH Monitoring and Analysis****Regulation and/or Permit Requirement:**

Section 8.A.8. & Table 8.A-3 of the MSGP identifies applicable effluent limitations to include annual monitoring of pH from “discharges resulting from spray down or intentional wetting of logs at wet deck storage areas.” “Compliance with these effluent limits is to be determined based on discharges from these industrial activities independent of commingling with any other waste streams that may be covered under this permit.”

Table 5 of the EPA MSGP Industrial Stormwater Monitoring and Sampling Guide (April 2021) states that pH has a 15-minute holding time; therefore, the sample must be analysed within 15 minutes of collection.

As discussed earlier in this report, although only required annually, a pH sample is currently collected quarterly (when discharging) where the stormwater pond discharges via culvert to the vegetative area south of Long Haul Creek. Samples are hand delivered to Anatek Labs, Inc.

The concern is that the pH sample collected is not independent of comingling with other waste streams and not exclusively from spray down or intentional wetting of logs at wet deck storage areas. Additionally, having the pH sample analysis being conducted by the contract laboratory exceeds the holding time of “within 15 minutes of collection.”

AOC Reference #: AOC-2**Corrective Action Documentation****Regulation and/or Permit Requirement:**

Section 3.2.2.5, 5.1.1 and 5.1.1.5 of the MSGP identifies conditions requiring corrective action documentation, including SWPPP review and revision: “whenever a visual assessment shows evidence of stormwater pollution (e.g., color, odor, floating solids, settled solids, suspended solids, foam.)” “You must review and revise, as appropriate, your SWPPP (e.g. source of pollution; spill and leak procedures; non-stormwater discharges; the selection, design, installation and implementation of your stormwater control measures) so that this permit’s effluent limits are met, and pollutant discharges are minimized.”

As discussed earlier in this report, as a subsample, visual assessment documentation from the following sampling events were reviewed as part of this inspection: August 21, 2021, November 30, 2021, December 14, 2022, March 8, 2023, and March 5, 2024.

According to the MSGP Visual Assessment Forms reviewed, collected samples were routinely documented with the following entries within the “Pollutants Observed” section of the Form:

- On March 5, 2024, the collected sample included the marked odor field to be “musty,” the clarity indicator was marked “cloudy,” and color was described as “slightly discolored/brown water sample.” **(Attachment D)**
- On March 8, 2023, the collected sample included the marked odor field to be “musty,” the clarity indicator was marked “cloudy,” and color was described as “slightly gray and small amount of sediment.” **(Attachment D)**,

The concern is that visual assessments of discharges are routinely documented with pollutants observed, including for odor, clarity, and color. No corresponding record of SWPPP review/revision was being documented as required by the permit.

AOC Reference #: AOC-3**Additional Implementation Measures (AIM)****Regulation and/or Permit Requirement:**

Section 5.2.2 and 5.2.2.1 of the MSGP identifies AIM triggering events: “You must follow the corresponding AIM level-responses and deadlines described in Parts 5.2.3, 5.2.4, and 5.2.5 unless you qualify for an exception under Part 5.2.6. An annual average exceedance for a parameter can occur if: four-quarterly annual average for a parameter exceeds the benchmark threshold.”

As discussed earlier within this report, at the time of inspection, it was discussed that the Facility continues to exceed the benchmark for Total Phosphorus when discharging. Based upon a review quarterly DMR data submitted over the past 5-years (May 2019 – May 2024), the Facility has reported 11 benchmark exceedances for Total Phosphorus. The Facility has adopted a discharge schedule where they are attempting to only discharge seasonally, during the first two quarters of each year. For the other two quarters, the Facility utilizes the ponds storage capacity, or applies water from the pond to the wet deck/log storage area.

At the time of inspection, it was discussed that the Facility believes an AIM triggering event has not occurred due to the Facility not discharging for two quarters of the year, reducing their annual average. The concern is that the Facility’s AIM calculations are not including four consecutive sampling events, which would trigger an AIM response.

SECTION VI – CLOSING CONFERENCE AND POST INSPECTION ACTIVITIES**Closing Conference**

Following the Facility tour and records review, a closing conference was held with Mr. E. Smith, Ms. Taylor, Mr. F. Smith, and Mr. Miller. I discussed my general observations, potential area of concerns (AOC-1 and AOC-2) and next steps. I then thanked everyone for their time and cooperation with the inspection and departed the Facility.

Post-Inspection Activities

Post-inspection, on May 31, 2024, I provided a follow-up email summarizing the inspection activities and observations, including AOC-3) (**Attachment E**).

On June 6, 2024, Mr. Smith responded to my email, provided an update, and discussed that the Facility had negotiated the purchase of adjoining land below Outfall 001. (**Attachment F**).

SECTION VII – LIST OF APPENDICES

Attachment A – Aerial Image (Google Earth)

Attachment B – EPA 2021/2017 Additional Monitoring Requirements Letters

Attachment C – Photograph Log

Attachment D – March 5, 2024, and March 8, 2023, Visual Assessment Form

Attachment E – May 31, 2024, Post-Inspection Email Correspondence

Attachment F – June 6, 2024, Post-Inspection Email Correspondence

ATTACHMENT A

Aerial Image (Google Earth)



ATTACHMENT B

EPA 2021/2017 Additional Monitoring Requirements Letters



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
 1200 Sixth Avenue, Suite 155
 Seattle, WA 98101

WATER DIVISION

June 28, 2021

Reply to:
 Attn of: MS 19-C04

Mr. Jesse Short
 Idaho Forest Group
 171 Highway 95 North
 Grangeville, Idaho 83530
 jshort@idfg.com

Re: Additional Monitoring Requirements for Idaho Forest Group Grangeville under the National Pollutant Discharge Elimination System Multi-Sector General Permit, Permit Reference No. IDR053246

Dear Mr. Short:

The purpose of this letter is to notify you of watershed specific monitoring requirements that must be implemented at your facility to maintain permit coverage under the U.S. Environmental Protection Agency's 2021 Multi-Sector General Permit for Storm water Discharges Associated with Industrial Activity (MSGP). Based on the information provided in your Notice of Intent (NOI), storm water from the Idaho Forest Group facility at 171 Highway 95 North in Grangeville, Idaho (Facility) discharges into Long Haul Creek. The State of Idaho Department of Environmental Quality established Total Daily Maximum Loads (TMDLs) for the Cottonwood Creek watershed for total phosphorus, total inorganic nitrogen, temperature, sediment, and bacteria as *Escherichia coli*, which includes Long Haul Creek.

Basis for EPA to Add Additional Requirements

Part 2.2.2.1 of the MSGP, Existing Discharge to an Impaired Water with an EPA Approved or Established TMDL, states, "If you discharge to an impaired water with an EPA-approved or established TMDL, EPA will inform you whether any additional measures are necessary for your discharge to be consistent with the assumptions and requirements of the applicable TMDL and its wasteload allocation, or if coverage under an individual permit is necessary per Part 1.3.8."

Specific Requirements

The Facility is required to conduct storm water monitoring for total phosphorus, TSS, and total inorganic nitrogen following the standard benchmark monitoring procedures outlined in the MSGP at Part 4. The watershed specific target for TSS is lower than the industry sector benchmark in the permit. Monitoring for bacteria and temperature is not required at this time.

Parameter	Benchmark Values	Source of Value
Total Phosphorus	0.1 mg/L	Cottonwood Creek TMDL, 2000

Parameter	Benchmark Values	Source of Value
Total Suspended Solids	50 mg/l	Cottonwood Creek TMDL, 2000
Total Inorganic Nitrogen	0.3 mg/L	Cottonwood Creek TMDL, 2000

If you have any questions, please contact Margaret McCauley of my staff at (206) 553–1772 or by email at mccauley.margaret@epa.gov.

Sincerely,

Mathew J. Martinson
CAPT, USPHS
Branch Chief, Permits, Drinking Water, and
Infrastructure

cc: Sujata Connell, Idaho Department of Environmental Quality



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10**

1200 Sixth Avenue, Suite 900
Seattle, WA 98101-3140

OFFICE OF
WATER AND
WATERSHEDS

Reply to Attn of: OWW-191

DEC 05 2017

Jesse Short
Idaho Forest Group
171 Highway 95 North
Grangeville, ID 83530

Re: Additional Monitoring Requirements for Idaho Forest Group Grangeville under the National Pollutant Discharge Elimination System Multi-Sector General Permit, Permit Reference No. IDR053246

Dear Mr. Short:

The purpose of this letter is to notify you of watershed specific monitoring requirements that must be implemented at your facility to maintain permit coverage under the U.S. Environmental Protection Agency's (EPA) 2015 Multi-Sector General Permit for Storm water Discharges Associated with Industrial Activity (MSGP). Based on the information provided in your Notice of Intent (NOI), storm water from the Idaho Forest Group facility at 171 Highway 95 North in Grangeville, Idaho (Facility) discharges into Long Haul Creek. The State of Idaho Department of Environmental Quality established Total Daily Maximum Loads (TMDLs) for the Cottonwood Creek watershed for total phosphorus, total inorganic nitrogen, temperature, sediment, and bacteria as *Escherichia coli*, which includes Long Haul Creek.

Specific Requirements

Pursuant to Parts 2.2.2.1 and 6.2.4.1 of the MSGP, the Facility is required to conduct storm water monitoring for total phosphorus, TSS, and total inorganic nitrogen following the standard benchmark monitoring procedures outlined in the MSGP at Part 6.2.1. The watershed specific target for TSS is lower than the industry sector benchmark in the permit. Monitoring for bacteria and temperature is not required at this time.

Parameter	Benchmark Values	Source of Value
Total Phosphorus	0.1 mg/L	Cottonwood Creek TMDL, 2000
Total Suspended Solids	50 mg/l	Cottonwood Creek TMDL, 2000
Total Inorganic Nitrogen	0.3 mg/L	Cottonwood Creek TMDL, 2000

Basis for EPA to Add Additional Requirements

Part 2.2.2.1 of the MSGP, Existing Discharge to an Impaired Water with an EPA Approved or Established TMDL, states, "If you discharge to an impaired water with an EPA-approved or established TMDL, EPA will inform you whether any additional measures are necessary for your discharge to be consistent with the assumptions and requirements of the applicable TMDL and its wasteload allocation, or if coverage under an individual permit is necessary per Part 1.2.3." See also Part 6.2.5 of the MSGP (allowing EPA to notify a facility of additional monitoring requirements).

If you have any questions, please contact Margaret McCauley of my staff at mccauley.margaret@epa.gov or (206) 553-1772.

Sincerely,

A handwritten signature in black ink, appearing to read "Karen Burgess".

Karen Burgess, Acting Manager
NPDES Permits Unit

cc: Sujata Connell, Idaho Department of Environmental Quality

ATTACHMENT C

Photograph Log

All photographs taken by Jon Klemesrud on May 23, 2024

Nikon Coolpix AW100

Photograph Log – Idaho Forest Group – Grangeville



Photo #:01 (DSCN3770)

Description: Photo of printed map used for Facility walk-through.



Photo #:02 (DSCN3771)

Description: Facing west, photo of drainage channel used for collecting/routing stormwater from the parking area to the stormwater collection pond.



Photo #:03 (DSCN3772)

Description: Facing east, photo of parking area near the office building.



Photo #:04 (DSCN3773)

Description: Facing east, photo of a stormwater catch basin along northeast of the entry scale/entrance. Stormwater is routed to the subsurface collection system to the stormwater collection pond.

Photograph Log - Idaho Forest Group – Grangeville



Photo #:05 (DSCN3774)

Description: Facing west, photo of southern perimeter of the log deck/storage area. Southern perimeter is bermed.



Photo #:06 (DSCN3775)

Description: Facing north, photo of east perimeter of the log deck storage area. Photo taken from southeast corner of the Facility. East perimeter is bermed.



Photo #:07 (DSCN3776)

Description: Facing north, photo of stormwater drainage channel along a primary access road. Photo was taken east of the fuel storage area and west of the shipping yard.



Photo #:08 (DSCN3777)

Description: Facing south, photo of diesel fuel tank and unleaded fuel tank used for on-site fueling. A spill kit is maintained within the fueling area.

Photograph Log - Idaho Forest Group – Grangeville



Photo #:09 (DSCN3778)

Description: Facing north, photo of primary catch basin capturing stormwater from central drainage area. Photo taken west of the log yard and south of the mill.



Photo #:10 (DSCN3779)

Description: Facing east, photo of catch basin within the "green lumber" storage area. Lumber is stored in the location temporarily after being milled, and prior to being dried in the kilns.



Photo #:11 (DSCN3780)

Description: Facing west, photo of catch basin east of the kilns.



Photo #:12 (DSCN3781)

Description: Facing north, photo of the Facility's vacuum sweeper truck.

Photograph Log - Idaho Forest Group – Grangeville



Photo #:13 (DSCN3782)

Description: Facing south, photo of catch basin south of the boiler building, north of the green lumber storage area.



Photo #:14 (DSCN3783)

Description: Facing north, photo of the Facility's boiler building.



Photo #:15 (DSCN3784)

Description: Facing north, photo of area west of the boiler building. Temporary boiler ash storage area.



Photo #:16 (DSCN3785)

Description: Photo of stormwater collection area from northwest corner of the Facility. Culvert discharges to an initial stormwater channel prior to being discharged to stormwater collection pond.

Photograph Log - Idaho Forest Group – Grangeville



Photo #:17 (DSCN3786)

Description: Facing east, photo of stormwater channel along the northwest area of the Facility.



Photo #:18 (DSCN3787)

Description: Facing northwest, photo of northwest corner stormwater collection channel.



Photo #:19 (DSCN3788)

Description: Facing east, photo of northwest log deck storage area and access road to the stormwater collection pond.



Photo #:20 (DSCN3789)

Description: Facing east, photo of the drainage channel near the northwest log deck storage area.

Photograph Log - Idaho Forest Group – Grangeville



Photo #:21 (DSCN3790)

Description: Facing north, photo of the northwest discharge to an initial settling pond. Discharge is prior entering the larger stormwater collection pond.



Photo #:22 (DSCN3791)

Description: Facing south, photo of the northwest discharge to an initial settling pond. Discharge is prior entering the larger stormwater collection pond.



Photo #:23 (DSCN3792)

Description: Facing southwest, photo of stormwater drainage channel prior to discharge to stormwater collection pond.



Photo #:24 (DSCN3793)

Description: Facing northeast, photo of stormwater discharge to stormwater collection pond.

Photograph Log - Idaho Forest Group – Grangeville



Photo #:25 (DSCN3794)

Description: Facing northwest, photo of stormwater collection pond discharge to vegetative area west of the pond. According to the Facility, discharge enters the receiving water (Long Haul Creek) approximately 400 yards to the northwest.



Photo #:26 (DSCN3795)

Description: Facing southeast, photo of pump station installed along the north end of the pond. Pump station to be used to route pond water to land application field north of Long Haul Creek.



Photo #:27 (DSCN3796)

Description: Facing north, photo of land application field north of the stormwater collection pond.



Photo #:28 (DSCN3797)

Description: Facing north, photo of log deck storage collection system discharge to stormwater collection pond.

Photograph Log - Idaho Forest Group – Grangeville



Photo #:29 (DSCN3798)

Description: Facing northwest, photo of stormwater collection pond.



Photo #:30 (DSCN3799)

Description: Facing south, photo of Long Haul creek, east of the Facility.



Photo #:31 (DSCN3800)

Description: Facing north, photo of Long Haul Creek, easter of the Facility.



Photo #:32 (DSCN3801)

Description: Facing west, photo of stormwater collection channel located in the northeast corner of the log deck storage area.

Photograph Log - Idaho Forest Group – Grangeville



Photo #:33 (DSCN3802)

Description: Facing south, photo of stormwater collection channel located east of the log deck storage area.



Photo #:34 (DSCN3803)

Description: Facing north, photo of western perimeter. West Fork of Long Haul Creek travel's adjacent to the Facility.



Photo #:35 (DSCN3804)

Description: Facing south, photo of western perimeter. West Fork of Long Haul Creek travels adjacent to the Facility.



Photo #:36 (DSCN3805)

Description: Facing south, photo of sawdust and chip bins from the planer building.

Photograph Log - Idaho Forest Group – Grangeville



Photo #:37 (DSCN3806)

Description: Facing southeast, photo of drainage channel along southwest perimeter.



Photo #:38 (DSCN3807)

Description: Photo of MSGP permit signage posted southwest of the Pine Building along the highway.

ATTACHMENT D

March 5, 2024, and March 8, 2023, Visual Assessment Form

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:

Idaho Forest Group / Grangeville

NPDES Tracking No. **IDR053246**

Outfall Name: **001**

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

Person(s)/Title(s) collecting sample: Necole Taylor GV Environmental Lead

Person(s)/Title(s) examining sample: Anatek Labs Moscow, Id.

Date & Time Discharge Began: **3-5-2024 @ 7:48AM**

Date & Time Sample Collected: **3-5-2024 @ 9:15AM**

If sample not taken within first 30 minutes, explain why. Had to wait for enough discharge to get all four sample bottles filled.

Substitute Sample? ☒ No

☐ Yes (identify quarter/year when sample was originally scheduled to be collected):

Nature of Discharge: ☐ Rainfall ☒ Snowmelt

If rainfall: Rainfall Amount:

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

Pollutants Observed

Color ☐ None ☐ Other (describe): slightly discolored/brown water sample

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

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

* 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).

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.

Name:
Necole Taylor

Title:
GV
Environ
mental
Lead

Signature:



Date signed: 3-5-2024

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:

Idaho Forest Group / Grangeville

NPDES Tracking No. **IDR053246**

Outfall Name: **001**

"Substantially Identical
Discharge Point"?

☐ Yes (identify substantially identical outfalls):
☒ No

Person(s)/Title(s) collecting sample: Necole Taylor

Person(s)/Title(s) examining sample: Stormwater Tech Training

Date & Time Discharge Began: 3/8/23 due to melting
snowpack and was able to start sampling around 7:15AM.
Everything has been frozen solid and not able to obtain
sample.

Date & Time Sample Collected: 3/8/23
starting at 7:15AM

Date & Time Sample
Examined: Same

If sample not taken within first 30 minutes,
explain why.

Substitute Sample? ☒ No

☐ Yes (identify quarter/year when sample was originally scheduled to be collected):

Nature of Discharge: ☐ Rainfall ☒ Snowmelt

If rainfall: Rainfall Amount: N/A

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

Pollutants Observed

Color ☐ None ☒ Other (describe): slightly grey and small amount of sediment

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 Sheen ☒ None ☐ Flecks ☐ Globs ☐ Sheen ☐ Slick ☐ Other (describe): _____Other Obvious Indicators of Stormwater Pollution ☒ No ☐ Yes (describe): _____

* 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).

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.

Name: Nicole TaylorTitle: Stormwater Tech. trainingSignature: Nicole TaylorDate signed: 3-8-2023

ATTACHMENT E

May 31, 2024, Post-Inspection Email Correspondence

From: [Klemesrud, Jon](#)
To: [Smith, Eric](#)
Cc: [Carolyn Whitney](#)
Bcc: [Kim, Stacey](#)
Subject: EPA Stormwater Inspection - Idaho Forest Group (Grangeville)
Date: Friday, May 31, 2024 10:15:00 AM

Hi Eric,

Thanks again for your time and assistance last week for the EPA inspection in Grangeville, I enjoyed meeting you, Necole, Fred, and Jim while on-site. You were great hosts and seemed very knowledgeable on many items related to stormwater compliance.

If helpful just to summarize again, I was tasked by EPA Region 10 (R10) to conduct an on-site Clean Water Act (CWA) inspection, pursuant to the facility's coverage under the industrial stormwater [2021 Multi-Sector General Permit \(MSGP\)](#) (Tracking #IDR053246). R10 routinely works with IDEQ (and others) on conducting inspections under the CWA. Note that the inspection last week was routine in nature and not based off any complaints. According to EPA/IDEQ records, the facility hadn't been inspected for permit compliance in recent years.

As discussed on-site, I will be reviewing my notes/photographs while preparing my inspection report that will be transmitted to you electronically upon completion. I wanted to send this initial/inspection follow-up email to ensure you have my contact information and to circle back on a few items that were discussed.

1. Regarding pH Monitoring, the citation was found within Section 8.A.8 Table 8.A-3 of the MSGP (page 74 of the permit), a "Sector Specific Requirement." Per the permit, pH monitoring is required only annually and must be collected "independent of commingling with any other waste streams that may be covered under this permit" and must be from collected of "discharges resulting from spray down or intentionally wetting of logs at wet deck storage areas." To assist with understanding/sampling, here is a link to the [Industrial Stormwater Monitoring and Sampling Guide](#), as seen on page 33 of the guide, the holding time of a pH sample is (15 min). At the time of inspection, it was discussed that pH is being analyzed at the contract laboratory (exceeding the holding time).
2. Regarding Corrective Action Documentation, Section 5.1.1 and 5.1.1.5. of the MSGP (page 45 of the permit) discusses that "Conditions Requiring SWPPP Review and Revision to Ensure Effluent Limits are Met" are to include "whenever a visual assessment shows evidence of stormwater pollution (e.g., color, odor, floating solids, settled solids, suspended solids, foam.) Page 14 of the [MSGP 2021 Record Keeping Template](#) offers a template to document corrective actions. At the time of inspection, it was discussed that corrective action documentation is not completed during incidences of "observed pollution" during visual assessments.
3. I also wanted to address benchmark monitoring, as discussed in Section 4.2.2.3 of the MSGP (page 39), "If the annual average for a parameter does not exceed the benchmark threshold, you can discontinue benchmark monitoring for that parameter for the next two years (eight

quarters).”

4. Regarding Additional Implementation Measures (AIM), on-site it was discussed that the facility believes an AIM triggering event has not occurred due to the facility not discharging for two quarters each year (approx..). However, per Section 5.2.2.1. of the MSGP (page 47), AIM triggering events include “four-quarterly annual average for a parameter exceeds the benchmark threshold.” I believe the intent of the permit requirement is that for AIM calculations, you would include sample results for each quarterly monitoring period in which a sample is taken. Not discharging would not factor into the AIM calculations. Based upon the continued benchmark exceedances for Phosphorus (four-quarterly annual average), this would trigger AIM. There is a AIM calculator that was developed for the permit if helpful: [AIM CALCULATOR](#).

As a reminder, my observations on-site should not be interpreted as a final compliance determination. If you have any further questions about the inspection process or want to discuss any items in more detail, please feel free to reach out to myself, or Carolyn Whitney (IDEQ) (cc’d).

Jon Klemesrud
Enforcement & Compliance Assurance Division (M/S 20-C04)
U.S. Environmental Protection Agency, Region 10
(206) 553-5068

ATTACHMENT F

June 6, 2024, Post-Inspection Email Correspondence

From: [Smith, Eric](#)
To: [Klemesrud, Jon](#)
Cc: [Carolyn Whitney](#); [Eric Hasenoehrl](#); [Miller, Jim](#); [Short, Jesse](#)
Subject: RE: EPA Stormwater Inspection - Idaho Forest Group (Grangeville)
Date: Wednesday, June 12, 2024 8:09:01 AM

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

Jon,

We hope this finds you well.

I just wanted to send you a reply to acknowledge your message and provide you a brief update.

We appreciate your message and the opportunity to learn and improve. We have scheduled a meeting with our consultant and our Stormwater Team to review your comments and take action as needed.

While not wanting to get ahead of ourselves, I thought you might like to know that we have been given permission from our senior management to negotiate the purchase of the adjoining land below outfall 001 and have come to an agreement with the current landowner, so now we are just waiting to close. This should be very helpful to improving water quality and we will work with our consultants and the DEQ to make any edits to our SWPPP as needed.

Idaho Forest Group has worked hard to be good environmental stewards. We hope that our proactive commitment was evident to you during our inspection. We are also hopeful that EPA will recognize our efforts when determining our compliance status.

Eric Smith

Plant Superintendent - Grangeville

Idaho Forest Group

171 Highway 95 North

Grangeville, ID 83530

Office: (208)983-4760

Eric.Smith@ifg.com



From: Klemesrud, Jon <Klemesrud.Jon@epa.gov>
Sent: Friday, May 31, 2024 10:16 AM
To: Smith, Eric <Eric.Smith@ifg.com>
Cc: Carolyn Whitney <carolyn.whitney@deq.idaho.gov>
Subject: EPA Stormwater Inspection - Idaho Forest Group (Grangeville)