

INSPECTION REPORT

Inspection Entry Date/Time	12/17/2024 09:05 AM (PT)	Announced: No	
Inspection Exit Date/Time	12/17/2024 11:05 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	Lurre Construction		
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	43.467962, -116.16060		
Mailing Address	307 Badiola Street		
City, State, Zip Code	Caldwell, Idaho 836056		
FRS ID	IDT8632340353		
Permit Number	IDR05J100		
SIC	1442 (Construction sand & gravel mining) 1429 (Other crushed & broken stone mining & quarrying (pt))		
Lead Inspector:			
Raymond Andrews	EPA Region 10	andrews.raymond@epa.gov	(206) 553-4252
Supervisor Review:			
Peter Contreras	EPA Region 10	contreras.peter@epa.gov	(206) 553-6708

SECTION I – Opening Conference

I arrived at the Lurre Construction site (“Site”), located at East Kuna Mora Road, Kuna, Idaho, at 09:05 AM on 12/17/2024 for an unannounced inspection. I presented my credentials to Mike Kolberg, Foreman, 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 # IDR05J100. This report is based on information supplied by Mr. Kolberg, Jack Nygaard, Syman Consultant, 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.

Lurre Construction is not a construction operation. It excavates sand, gravel and rock which are used for various aspects of construction projects.

Lurre shares the site with Granite Excavation (IDR05J10R) and they use the same consultant, Syman Company, to manage stormwater. Lurre Construction operates from the lower 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 Lurre’s and Granite’s activities. In addition to writing the site’s SWPPP, Syman maintains the Best Management Practices (BMPs), conducts routine site inspections, and conducts sampling.

The Syman representative that works with Lurre and Granite, Jack Nygaard, was unavailable on the day of the Lurre inspection but he was there for the Granite inspection the following day and provided information for the Lurre inspection that Mr. Kolberg was unable to provide.

Attendees

Organization	Attendee Name	Title	Present in Opening Conf.	Present in Closing Conf.
EPA Region 10	Raymond Andrews	Lead Inspector	Yes	Yes
Lurre Construction	Mike Kolberg	Foreman	Yes	Yes

Site Information

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?	Lurre Construction 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 Lurre operations discharged through a single outfall, Outfall 001. There are no inlets or drains on site.

Sampling locations?	The site's discharge is sampled at Outfall 001.
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 on site that constituted an area of concern.

SECTION III – Records Review

Records may not be in sequential order.

Record: SWPPP		AOC: No
Ref #: RA1-RR-007	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 (IDR05J100) 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-006	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: Yes
Ref #: RA1-RR-005	Reviewed By: Raymond Andrews	Reviewed Date: 01/24/2025
Post inspection, I reviewed the Site's Routine Inspection Reports from 4Q 2022 through 4Q 2024. The report for 4Q 2022, dated November 30, 2022, checked "No" in the box for the fueling area indicating the controls were not adequate and recommended secondary containment be installed for "fuel/drums." The lack of secondary containment was reported again on the 1Q 2023 routine site inspection report. The 2Q 2023 - 4Q 2024 inspection reports indicate the fueling area had adequate controls during those inspections but none of the reviewed reports indicate what was done to bring the secondary containment from "not adequate" to "adequate".		
Record: Other - Site Annual Reports		AOC: Yes
Ref #: RA1-RR-004	Reviewed By: Raymond Andrews	Reviewed Date: 01/24/2025
Post inspection, I reviewed two of the Site's Annual Reports. One of the annual reports appears to be for the reporting year 2022 based on its contents. However, that report was not dated, signed and certified as required. The other Annual Report was for the 2023 report year and was properly dated, signed, and certified.		
Record: Notice of Intent		AOC: No
Ref #: RA1-RR-003	Reviewed By: Raymond Andrews	Reviewed Date: 12/12/2024
Prior to the inspection, I reviewed the site's Notice of Intent (NOI) to discharge, dated September 22, 2022. No area of concern was identified.		
Record: Other - Letter of Authorization to Discharge		AOC: No
Ref #: RA1-RR-002	Reviewed By: Raymond Andrews	Reviewed Date: 12/12/2024
Prior to the inspection, I reviewed a Letter of Authorization, dated October 26, 2022, to discharge under Idaho's 2021 Multi-Sector General Permit for Storm Water Discharges Associated with Industrial Activity (MSGP).		
Record: Other - ICIS Benchmark Report		AOC: No
Ref #: RA1-RR-001	Reviewed By: Raymond Andrews	Reviewed Date: 12/12/2024
Prior to the inspection, I reviewed a benchmark report generated from EPA's Integrated Compliance Information System (ISCIS) 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 Areas of Concern does not constitute a formal compliance determination or violation.

AOC Reference #: RA1-RR-004	Records Review: Other - Site Annual Reports
Permit Requirement Part 7.4 of the Permit states, in part, "You must submit an Annual Report to EPA via NeT-MSGP...by January 30th for each year of permit coverage containing information generated from the past calendar year. You must include the following information in the Annual Report..." Part 7.4.3 of the Permit states, in part, "Your Annual Report must also include a statement, signed and certified in accordance with Appendix B, Subsection 11." Appendix B, Subsection 11, of the Permit states, "Any person signing documents in accordance with Appendix B, Subsections 11.A or 11.B above must include 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 contained 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." "	
AOC: The Annual Report for the reporting year 2022 was not dated, signed and certified as required.	
AOC Reference #: RA1-RR-007	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.	
AOC Reference #: RA1-RR-005	Records Review: Other - Site Routine Inspection Reports
Permit Requirement Part 3.1.6 of the Permit states, in part, "You must document the findings of your facility inspections and maintain this report with your SWPPP...You must conduct any corrective action required as a result of a routine facility inspection..." Part 6 of the Permit states, in part, "As distinct from the SWPPP, the additional documentation requirements (see Part 6.5) are so that you document the implementation (including inspection, maintenance, monitoring, and corrective action) of the permit requirements." Part 6.5 of the Permit states, in part, "...the site is required to keep the following inspection, monitoring, and certification records with your SWPPP...6.5.4 Documentation of any maintenance and repairs of stormwater 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..."	
AOC: The Site did not document corrective actions taken to address the lack of secondary containment.	

SECTION VI – Closing Conference

I held a closing conference with Mr. Kolberg at 11:05 AM (PT) on 12/17/2024 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



SWPPP			IMG-2024121709290929992564.jpg
12/17/2024 09:29 AM	No CBI	No PII	Photographer: Raymond Andrews
Site Entrance			43.45889954, -116.25683151
Site Entrance Sign with SWPPP, Photo 1			



SWPPP			IMG-20241217092950295078753.jpg
12/17/2024 09:29 AM	No CBI	No PII	Photographer: Raymond Andrews
Site Entrance			43.45889954, -116.25683151
Site Entrance Sign with SWPPP, Photo 2			



Lurre Site			IMG-202412171006026288907.jpg
12/17/2024 10:06 AM	No CBI	No PII	Photographer: Raymond Andrews
43.46565925, -116.16299315			
Conveyor, photo 1			



Lurre Site			IMG-202412171006046485726.jpg
12/17/2024 10:06 AM	No CBI	No PII	Photographer: Raymond Andrews
43.46565925, -116.16299315			
Conveyor, photo 2			



Lurre Site			IMG-202412171008038388815.jpg
12/17/2024 10:08 AM	No CBI	No PII	Photographer: Raymond Andrews
43.46567401, -116.16302884			
End of Conveyor on left side of photo with bucket loader and dump truck			



Lurre Site			IMG-20241217101134113490247.jpg
12/17/2024 10:11 AM	No CBI	No PII	Photographer: Raymond Andrews
43.46567401, -116.16302884			
General site photo			



Lurre Site			IMG-202412171012371237105595.jpg
12/17/2024 10:12 AM	No CBI	No PII	Photographer: Raymond Andrews
43.46567401, -116.16302884			
Access Road with working rock pile on the left			



Lurre Site			IMG-202412171012461246104539.jpg
12/17/2024 10:12 AM	No CBI	No PII	Photographer: Raymond Andrews
43.46619069, -116.16298221			
Rock Crusher with piled rock in foreground			



Lurre Site			IMG-20241217101517151775904.jpg
12/17/2024 10:15 AM	No CBI	No PII	Photographer: Raymond Andrews
43.46267093, -116.15593659			
Access road with active site perimeter berm, photo 1			



Lurre Site			IMG-20241217101524152481859.jpg
12/17/2024 10:15 AM	No CBI	No PII	Photographer: Raymond Andrews
43.46267005, -116.15594107			
Access road with active site perimeter berm, photo 2			