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HEARINGS CLERK  
EPA -- REGION 10

BEFORE THE  
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

In the Matter of: )  
 ) DOCKET NO. CWA-10-2017-0023  
 )  
Woodgrain Millwork, Inc. )  
 ) **CONSENT AGREEMENT AND**  
 ) **FINAL ORDER**  
 )  
Respondent. )  
\_\_\_\_\_

**I. STATUTORY AUTHORITY**

1.1. This Consent Agreement and Final Order (“CAFO”) is issued under the authority vested in the Administrator of the U.S. Environmental Protection Agency (“EPA”) by Section 309(g)(2)(B) of the Clean Water Act (“CWA”), 33 U.S.C. § 1319(g)(2)(B).

1.2. The Administrator has delegated the authority to issue the Final Order contained in Part V of this CAFO to the Regional Administrator of EPA Region 10, who has redelegated this authority to the Regional Judicial Officer in EPA Region 10.

1.3. Pursuant to Section 309(g)(1) and (2)(B) of the CWA, 33 U.S.C. § 1319(g)(1) and (2)(B), and in accordance with the “Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties,” 40 C.F.R. Part 22, EPA issues, and Woodgrain Millwork, Inc. (“Respondent”) agrees to issuance of, the Final Order contained in Part V of this CAFO.

## **II. PRELIMINARY STATEMENT**

2.1. In accordance with 40 C.F.R. §§ 22.13(b) and 22.18(b), issuance of this CAFO commences this proceeding, which will conclude when the Final Order contained in Part V of this CAFO becomes effective.

2.2. The Administrator has delegated the authority to sign consent agreements between EPA and the party against whom a Class II penalty is proposed to be assessed pursuant to Section 309(g) of the CWA, 33 U.S.C. § 1319(g), to the Regional Administrator of EPA Region 10, who has redelegated this authority to the Director of the Office of Compliance and Enforcement, EPA Region 10 (“Complainant”).

2.3. Part III of this CAFO contains a concise statement of the factual and legal basis for the alleged violations of the CWA together with the specific provisions of the CWA and the implementing regulations that Respondents are alleged to have violated.

## **III. ALLEGATIONS**

3.1. Respondent Woodgrain Millwork, Inc. (“Woodgrain” or “Respondent”) is an Oregon corporation authorized to do business in the state of Idaho, and is a “person” as defined in Section 502(5) of the CWA, 33 U.S.C. § 1362(5).

3.2. Respondent operates a business at 300 Northwest 16<sup>th</sup> Street in Fruitland, Idaho 83619 (“Facility”). The Facility is approximately 43 acres and is bounded by 16<sup>th</sup> Street to the north, and residential neighborhoods and farmland to the east, south and west. A canal runs along the western edge of the facility. Along the eastern edge of the Facility is an open drainage ditch that connects to the City of Fruitland stormwater system.

3.3. Respondent’s business operations at the Facility include manufacturing finished wood moulding products used for various trim applications, finger joint products and decorative

wood blocks and wood dowels. Respondent's manufacturing operations are conducted indoors at buildings on the Facility. Various raw materials, equipment and byproducts are stored in outdoor locations around the Facility. Respondent identified its operations as covered by Standard Industrial Classification (SIC) code 2431 (Millwork).

3.4. The Facility has three stormwater drainage areas that each discharge through separate outfalls designated as outfall 1, outfall 2 and outfall 3. The outfall 1 drainage basin covers the northeast and central eastern areas of the Facility. Precipitation and runoff from the northeast corner is collected in an open ditch along the eastern edge of the Facility and is conveyed to outfall 1 which discharges through the City of Fruitland storm drain to the Payette River approximately one-mile to the north of the Facility. The outfall 2 drainage basin covers the southeastern and south central areas of the Facility. Precipitation and runoff from the southeastern and south central areas of the Facility is collected in several stormwater drains and/or catch basins and conveyed to outfall 2 which discharges to the canal that runs along the western edge of the Facility. The outfall 3 drainage basin covers the western area of the Facility. Precipitation and runoff from the western area of the Facility is collected in stormwater drains and/or catch basins and conveyed to outfall 3 which discharges to the canal that runs along the western edge of the Facility and discharges to the Payette River approximately one-mile north of the Facility.

3.5. The Payette River is a water of the United States as defined in 40 C.F.R. § 122.2, and a navigable water pursuant to Section 502(7) of the CWA, 33 U.S.C. § 1362(7).

3.6. Section 301(a) of the CWA, 33 U.S.C. § 1311(a), prohibits the discharge of pollutants from a point source unless the discharge is authorized by a National Pollutant Discharge Elimination System ("NPDES") permit issued pursuant to Section 402 of the CWA,

33 U.S.C. § 1342. Section 402(p) of the CWA, 33 U.S.C. § 1342(p), requires NPDES permits for stormwater discharges associated with industrial activity. A stormwater discharge associated with industrial activity is defined to include facilities classified under SIC category code 42. 40 C.F.R. § 122.26(b)(14)(ii).

3.7. Complainant is authorized pursuant to Section 402(a)(1) of the CWA, 33 U.S.C. § 1342(a)(1), to administer the NPDES permitting program for industrial stormwater. Complainant issued the 2008 Multi-Sector General Permit to authorize, subject to the terms and conditions of the permit, the discharge of stormwater associated with certain industrial operations, including operations conducted under SIC codes 2431 (Millwork). The 2008 MSGP became effective on September 29, 2008, and was modified on May 27, 2009 (hereinafter “MSGP”).

3.8. Respondent submitted a notice of intent and obtained coverage under the MSGP permit number IDR05C267.

3.9. The MSGP requires permittees to prepare and implement a Stormwater Pollution Prevention Plan (“SWPPP”) which includes the identification and implementation of best management practices (“BMPs”) intended to reduce or eliminate sources of pollutants in stormwater. The SWPPP also specifies how the permittee will implement other MSGP requirements including site inspections, stormwater sampling and monitoring, operation and maintenance of stormwater systems and corrective action requirements.

3.10. Section 2.1.2 of the MSGP establishes non-numeric technology-based effluent limitations to reduce exposure of pollutants to precipitation and the discharge of pollutants. Section 2.1.2.1 of the MSGP requires a permittee to minimize exposure of manufacturing, processing, and material storage areas to stormwater. Section 2.1.2.2 of the MSGP requires a permittee to implement good housekeeping measures. Section 2.1.2.3 of the MSGP requires a

permittee to regularly inspect, test, maintain and repair all stormwater systems to avoid releases or exposure of pollutants to stormwater. Section 2.1.2.4 of the MSGP requires a permittee to minimize the potential for leaks, spills and other releases that may be exposed to stormwater. Each section of the MSGP prescribes measures that a permittee must implement to comply.

3.11. Section 3.1 of the MSGP specifies that if a routine facility inspection or quarterly visual assessment identify that control measures are not being properly operated or maintained a permittee must review and revise the selection, design, installation and implementation of stormwater control measures to ensure that the condition is eliminated and will not be repeated. Sections 3.2 and 6.2.1.2 of the MSGP further states that if the average of four quarterly sampling results exceeds an applicable benchmark the permittee must review the selection, design, installation and implementation of control measures to determine if modifications are necessary to meet permit benchmarks. Section 3.3 of the MSGP establishes deadlines for the corrective actions that require documentation of any condition identified in Sections 3.1 and 3.2 within 24 hours of discovery, and documentation of the corrective action to be taken, or basis for not taking corrective action, within fourteen days of discovery. Any identified corrective actions must be implemented as soon as practicable.

3.12. Section 4.1.1 of the MSGP requires a permittee to conduct, at a minimum, routine quarterly inspections of all areas of the facility where industrial materials or activities are exposed to stormwater and of all stormwater control measures used to comply with the requirements of the permit. Section 7.5 of the MSGP requires that documentation of each quarterly, or more frequent, inspection be retained onsite for a period of at least three years from the date that permit coverage expires or is terminated. Such inspection documentation must be included as part of the SWPPP pursuant to Section 5.4 of the MSGP.

3.13. In addition to visual facility inspections, Section 4.2.1 of the MSGP requires a permittee to conduct, at a minimum, quarterly visual inspections of stormwater discharges, including the collection of a stormwater sample from each outfall. Section 4.2.2 states that documentation of quarterly visual stormwater discharge inspections should include, at a minimum, sample location(s), sample collection date and time, a visual assessment of each sample for certain water quality characteristics, the nature of any discharge (e.g, runoff or snowmelt), results of observations of the discharge, probable sources of any observed contamination, and the identification and signature of the facility personnel conducting the inspection. Section 7.5 of the MSGP requires that documentation of each quarterly, or more frequent, inspection be retained onsite for a period of at least three years from the date that permit coverage expires or is terminated. Such inspection documentation must be included as part of the SWPPP pursuant to Section 5.4 of the MSGP.

3.14. The SWPPP interprets and applies MSGP requirements to specific facilities. Section 5.1 of the MSGP lists the elements that must be include in a SWPPP. Section 5.1.2 of the MSGP requires that the SWPPP contain a site description of the facility including a detailed site map that depicts the size of the property, identifies significant structures, stormwater features and flow directions and all existing structural stormwater control features. Section 5.1.5.1 of the MSGP requires the SWPPP to document training schedules to meet the requirement of Section 2.1.2.9 of the MSGP which requires training for all employees responsible for implementing the activities necessary to comply with the MSGP, including all members identified as the pollution prevent team. Section 5.1.5.2 of the MSGP requires that the SWPPP document procedures for conducting the analytical monitoring required by the MSGP.

3.15. Section 6 of the MSGP requires a permittee to collect and analyze stormwater samples from each outfall at the facility and document monitoring activities. Section 6.2 requires that stormwater samples be compared to industry-specific benchmark concentrations established in Section 8 of the MSGP. Section 8, Subpart A of the MSGP identifies specific requirements for the Timber Product facilities. Table 8.A.1 lists subsectors of the timber products industry and identifies the pollutants and benchmark concentrations applicable to each subsector, including subsector A.4 for Millwork (SIC 2431) which establishes requirements for monitoring chemical oxygen demand, with a benchmark concentration of 120 mg/L, and total suspended solids, with a benchmark concentration of 100 mg/L.

3.16. On July 20, 2015, Complainant conducted an unannounced inspection of the Facility. The weather during the inspection was clear with no precipitation. As part of the inspection, Complainant requested to review records related to Respondent's compliance with the MSGP including the Facility's SWPPP and all associated facility inspection reports, visual assessment reports and annual reports.

3.17. The SWPPP provided to Complainant at the time of the inspection did not contain certain content required by the MSGP including a site map, schedule of stormwater training for employees, and procedures for conducting analytical monitoring.

3.18. The records provided to Complainant at the time of inspection did not include quarterly inspections of the Facility for the years 2012 up to the date of the inspection.

3.19. The quarterly visual assessment records provided to Complainant at the time of the inspection included incomplete documentation for all four quarters of 2012; the first, third and fourth quarter of 2013; all four quarters of 2014; and the first and second quarters of 2015. The quarterly visual assessment records were incomplete because they failed to document

information included, but not limited to, identification and signature of the employee collecting samples and conducting the inspection, a description of the nature of discharge, results from the visual observation of stormwater discharge and the probably sources of any observed stormwater contamination.

3.20. Complainant reviewed available benchmark monitoring data provided at the time of the inspection dating back to the first quarter of 2011. The benchmark monitoring data documented of the benchmark for chemical oxygen demand at outfalls 2 and 3, and the benchmark for total suspended solids at outfalls 1, 2 and 3. The monitoring data documents the exceedance of these benchmarks since the first quarter of 2011. The corrective action documentation provided to Complainant at the time of inspection failed to document corrective action determinations for the benchmark exceedances of chemical oxygen demand at outfalls 2 and 3 and the benchmark exceedances for total suspended solids at outfalls 1, 2 and 3.

3.21. Following Complainant's inspection, Respondent provided Complainant various supplemental information in response to Complainant's allegations that, in some instances, confirmed compliance with the MSGP.

**Alleged Violation 1  
(Violation of Section 2.1.2.1 of the MSGP)**

3.22. Paragraphs 3.1 to 3.21 are realleged and incorporated herein by reference.

3.23. Section 2.1.2.1 of the MSGP requires a permittee to minimize exposure to pollutants.

3.24. EPA alleges that Respondent violated the MSGP by failing to implement adequate measures to minimize exposure of pollutants to stormwater. Violations the MSGP are enforceable under section 309(g) of the CWA, 33 U.S.C. § 1319(g)



**Alleged Violation 2**  
**(Violation of Section 2.1.2.2 of the MSGP)**

3.25. Paragraphs 3.1 to 3.21 are realleged and incorporated herein by reference.

3.26. Section 2.1.2.2 of the MSGP requires a permittee to implement good housekeeping measures.

3.27. EPA alleges that Respondent violated Section 2.1.2.2 of the MSGP by failing to clean accumulation of debris from various catch basins and/or storm drains at the Facility.

Violations of the MSGP are enforceable under section 309(g) of the CWA, 33 U.S.C. § 1319(g).

**Alleged Violation 3**  
**(Violation of Section 2.1.2.3 of the MSGP)**

3.28. Paragraphs 3.1 to 3.21 are realleged and incorporated herein by reference.

3.29. Section 2.1.2.3 of the MSGP requires a permittee to regularly inspect, test, maintain and repair all stormwater systems to avoid releases or exposure of pollutants to stormwater.

3.30. EPA alleges that Respondent violated the maintenance requirements in Section 2.1.2.3 of the MSGP by failing to replace or repair worn filter socks installed to prevent pollutants from entering catch basins and/or storm drains at the Facility. Violations of section of the MSGP are enforceable under section 309(g) of the CWA, 33 U.S.C. § 1319(g).

**Alleged Violation 4**  
**(Violations of Section 2.1.2.4 of the MSGP)**

3.31. Paragraphs 3.1 to 3.21 are realleged and incorporated herein by reference.

3.32. Section 2.1.2.4 of the MSGP requires a permittee to minimize the potential for leaks, spills and other releases that may be exposed to stormwater by, among other measures, providing appropriate barriers and secondary containment for material storage areas.

3.33. EPA alleges that Respondent violated Section 2.1.2.4 of the MSGP by failing to store liquid waste and various chemical products in areas with secondary containment. Violations of Section 2.1.2.4 of the MSGP are enforceable under section 309(g) of the CWA, 33 U.S.C. § 1319(g).

**Alleged Violation 5  
(Violations of Section 4.1.1 of the MSGP)**

3.34. Paragraphs 3.1 to 3.21 are realleged and incorporated herein by reference.

3.35. Section 4.1.1 of the MSGP requires a permittee to conduct, at a minimum, routine quarterly inspections of all areas of the facility where industrial materials or activities are exposed to stormwater and of all stormwater control measures used to comply with the requirements of the permit.

3.36. EPA alleges Respondent violated Section 4.1.1 of the MSGP by failing to conduct quarterly facility inspections from 2012 through the second quarter of 2015. Violations of the MSGP are enforceable under section 309(g) of the CWA, 33 U.S.C. § 1319(g).

**Alleged Violation 6  
(Violations of Section 4.2.2 of the MSGP)**

3.37. Paragraphs 3.1 to 3.21 are realleged and incorporated herein by reference.

3.38. Section 4.2.2 of the MSGP requires that documentation of quarterly visual stormwater discharge inspections should include, at a minimum, sample location(s), sample collection date and time, a visual assessment of each sample for certain water quality characteristics, the nature of any discharge (e.g, runoff or snowmelt), results of observations of the discharge, probable sources of any observed contamination, and the identification and signature of the facility personnel conducting the inspection.

3.39. EPA alleges that Respondent prepared incomplete documentation of quarterly visual assessment records for all four quarters of 2012; the first, third and fourth quarter of 2013; all four quarters of 2014; and the first and second quarters of 2015. Violations of the MSGP are enforceable under section 309(g) of the CWA, 33 U.S.C. § 1319(g).

**Alleged Violation 7  
(Violation of Section 5.1.5.1 of the MSGP)**

3.40. Paragraphs 3.1 to 3.21 are realleged and incorporated herein by reference.

3.41. Section 5.1.5.1 of the MSGP requires the SWPPP to document training schedules to meet the requirement of Section 2.1.2.9 of the MSGP which requires training for all employees responsible for implementing the activities necessary to comply with the MSGP, including all members identified as the pollution prevent team.

3.42. EPA alleges that Respondent violated Section 5.1.5.1 by failing to include a training schedule for employees as part of the SWPPP. Violations of the MSGP are enforceable under section 309(g) of the CWA, 33 U.S.C. § 1319(g).

**Alleged Violation 8  
(Violations of Section 5.1.5.2 of the MSGP)**

3.43. Paragraphs 3.1 to 3.21 are realleged and incorporated herein by reference.

3.44. Section 5.1.5.2 of the MSGP requires that the SWPPP document procedures for conducting the analytical monitoring required by the MSGP.

3.45. EPA alleges that Respondent violated Section 5.1.5.2 of the MSGP by failing to include documentation of analytical procedures as part of the SWPPP. Violations of the MSGP are enforceable under section 309(g) of the CWA, 33 U.S.C. § 1319(g).

**Alleged Violation 9  
(Violations of Section 5.1.2 of the MSGP)**

3.46. Paragraphs 3.1 to 3.21 are realleged and incorporated herein by reference.

3.47. Section 5.1.2 of the MSGP requires that the SWPPP contain a site description of the facility including a detailed site map that depicts the size of the property, identifies significant structures, stormwater features and flow directions and all existing structural stormwater control features.

3.48. EPA alleges that Respondent violated Sections 5.1.2 of the MSGP by failing to include a site map as part of the SWPPP. Violations of the MSGP are enforceable under section 309(g) of the CWA, 33 U.S.C. § 1319(g).

**Alleged Violation 10  
(Violation of Sections 6.2.1.2 and 3.2 of the MSGP)**

3.49. Paragraphs 3.1 to 3.21 are realleged and incorporated herein by reference.

3.50. Sections 3.2 and 6.2.1.2 of the MSGP require that if the average of four quarterly sampling results exceeds an applicable benchmark the permittee must review the selection, design, installation and implementation of control measures to determine if modifications are necessary to meet permit benchmarks.

3.51. EPA alleges that Respondent violated Sections 3.2 and 6.2.1.2 by failing to make a corrective action determination for benchmark exceedances of chemical oxygen demand at outfalls 2 and 3 from the first quarter of 2011 to present. EPA further alleges that Respondent violated Sections 3.2 and 6.2.1.2 by failing to make a corrective action determination for benchmark exceedances of total suspended solids at outfalls 1, 2 and 3 from the first quarter of 2011 to present. Violations of the MSGP are enforceable under section 309(g) of the CWA, 33 U.S.C. § 1319(g).

#### IV. CONSENT AGREEMENT

4.1. Respondents admit the jurisdictional allegations of this CAFO.

4.2. Respondents neither admit nor deny the allegations contained in this CAFO.

4.3. As required by Section 309(g)(3) of the CWA, 33 U.S.C. § 1319(g)(3), EPA has taken into account the nature, circumstances, extent, and gravity of the alleged violations as well as Respondents' economic benefit of noncompliance, ability to pay, and other relevant factors. After considering all of these factors, EPA has determined and Respondents agree that an appropriate penalty to settle this action is \$60,000.

4.4. Respondent agrees to pay the total civil penalty set forth in Paragraph 4.3 within 30 days of the effective date of the Final Order contained in Part V of this CAFO.

4.5. Payment under this CAFO must be made by a cashier's check or certified check payable to the order of "Treasurer, United States of America" and delivered to the following address:

U.S. Environmental Protection Agency  
Fines and Penalties  
Cincinnati Finance Center  
P.O. Box 979077  
St. Louis, MO 63197-9000

Respondents must note on the check the title and docket number of this action.

4.6. Respondents must serve photocopies of the check described in Paragraph 4.5 on the Regional Hearing Clerk and EPA Region 10 at the following addresses:

Regional Hearing Clerk  
U.S. Environmental Protection Agency  
Region 10, Mail Stop ORC-113  
1200 Sixth Avenue, Suite 900  
Seattle, WA 98101

Chae Park  
U.S. Environmental Protection Agency  
Region 10, Mail Stop OCE-101  
1200 Sixth Avenue, Suite 900  
Seattle, WA 98101

4.7. If Respondents fail to pay the penalty assessed by this CAFO in full by its due date, the entire unpaid balance of penalty and accrued interest shall become immediately due and owing. Such failure may also subject Respondents to a civil action to collect the assessed penalty under the CWA, together with interest, fees, costs, and additional penalties described below. In any collection action, the validity, amount, and appropriateness of the penalty shall not be subject to review.

4.7.1. Interest. Pursuant to Section 309(g)(9) of the CWA, 33 U.S.C. § 1319(g)(9), any unpaid portion of the assessed penalty shall bear interest at a rate established by the Secretary of Treasury pursuant to 31 U.S.C. § 3717(a)(1) from the effective date of the Final Order set forth in Part V, provided however, that no interest shall be payable on any portion of the assessed penalty that is paid within 30 days of the effective date of the Final Order.

4.7.2. Attorneys Fees, Collection Costs, Nonpayment Penalty. Pursuant to Section 309(g)(9) of the CWA, 33 U.S.C. § 1319(g)(9), if Respondents fail to pay on a timely basis the penalty set forth in Paragraph 4.3, Respondents shall pay (in addition to any assessed penalty and interest) attorneys fees and costs for collection proceedings and a quarterly nonpayment penalty for each quarter during which such failure to pay persists. Such nonpayment penalty shall be in an amount equal to 20% of the aggregate amount of Respondents' penalties and nonpayment penalties which are unpaid as of the beginning of such quarter.

4.8. The penalty described in Paragraph 4.3, including any additional costs incurred under Paragraph 4.7, above, represents an administrative civil penalty assessed by EPA and shall not be deductible for purposes of federal taxes.

4.9. The undersigned representative of Respondents certifies that he or she is authorized to enter into the terms and conditions of this CAFO and to bind Respondents to this document.

4.10. The undersigned representatives of Respondents also certify that, as of the date of Respondents' signature of this CAFO, Respondents have corrected the violation(s) alleged in Part III above.

4.11. Except as described in Subparagraph 4.7.2, above, each party shall bear its own costs in bringing or defending this action.

4.12. Respondents expressly waive any right to contest the allegations and waives any right to appeal the Final Order set forth in Part V.

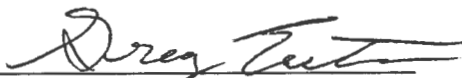
4.13. The provisions of this CAFO shall bind Respondents and their agents, servants, employees, successors, and assigns.

4.14. The above provisions are STIPULATED AND AGREED upon by Respondents and EPA Region 10.

DATED:

Greg Easton, Vice President Woodgrain Millwork, Inc.

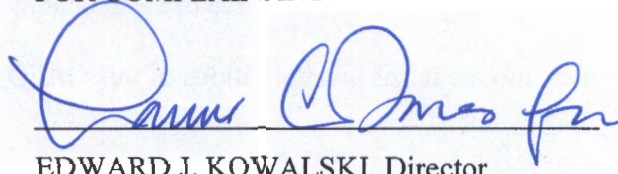
10/31/2016



DATED:

12-2-16

FOR COMPLAINANT:



EDWARD J. KOWALSKI, Director  
Office of Compliance and Enforcement  
EPA Region 10



## V. FINAL ORDER

5.1. The terms of the foregoing Parts I-IV are ratified and incorporated by reference into this Final Order. Respondents are ordered to comply with the terms of settlement.

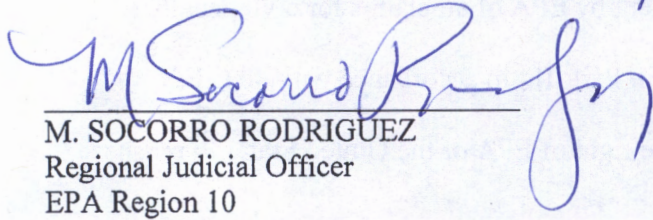
5.2. This CAFO constitutes a settlement by EPA of all claims for civil penalties pursuant to the CWA for the violations alleged in Part III. In accordance with 40 C.F.R. § 22.31(a), nothing in this CAFO shall affect the right of EPA or the United States to pursue appropriate injunctive or other equitable relief or criminal sanctions for any violations of law. This CAFO does not waive, extinguish, or otherwise affect Respondents' obligations to comply with all applicable provisions of the CWA and regulations promulgated or permits issued thereunder.

5.3. In accordance with Section 309(g)(1) of the CWA, 33 U.S.C. § 1319(g)(1), and 40 C.F.R. § 22.38(b), the Idaho Department of Environmental Quality has been given the opportunity to consult with EPA regarding the assessment of the administrative civil penalty against Respondents.

5.4. Pursuant to Section 309(g)(4)(A) of the CWA, 33 U.S.C. § 1319(g)(4)(A), and 40 C.F.R. § 22.45(b), EPA has issued public notice of and provided reasonable opportunity to comment on its intent to assess an administrative penalty against Respondents. More than 40 days have elapsed since issuance of this public notice and EPA has received no petition to set aside the Consent Agreement contained herein.

5.5. This Final Order shall become effective upon filing.

SO ORDERED this 2<sup>nd</sup> day of February, 2017.

  
M. SOCORRO RODRIGUEZ  
Regional Judicial Officer  
EPA Region 10

**CERTIFICATE OF SERVICE**

The undersigned certifies that the original of the attached **CONSENT AGREEMENT AND FINAL ORDER in the Matter of: Woodgrain Millworks, Inc., DOCKET NO.: CWA 10-2017-0023** was served on the addressees in the following manner on the date specified below:

The undersigned certifies that a true and correct copy of the document was hand delivered to:

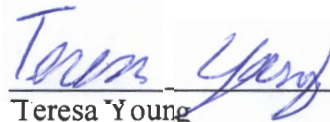
Alex Fidis  
U.S. Environmental Protection Agency, Region 10  
1200 6<sup>th</sup> Avenue, Suite 900  
MS ORC-113  
Seattle, WA 98101

Further, the undersigned certifies that a true and correct copy of the aforementioned document was sent by email and U.S. mail to:

Krista K. McIntyre  
Stoel Reeves LLP  
101 South Capitol Blvd., Suite 1900  
Boise, ID 83702

Debra Weisser  
Woodgrain Millworks, Inc.  
300 NW 16<sup>th</sup> Street  
Fuitland, ID 83619

Dated this   2   day of February, 2017



\_\_\_\_\_  
Teresa Young  
Regional Hearing Clerk  
EPA Region 10