

June 12, 1996

Monica Tonel
United States Environmental Protection Agency
1200 Sixth Avenue, HW-114
Seattle, WA 98101

Re: Contract No. 68-W6-0008, Technical Direction Document No. 96-03-0022
Simplot Feedlot Dump Preliminary Assessment

Dear Ms. Tonel:

Enclosed please find the Preliminary Assessment (PA) report completed for the Simplot Feedlot Dump site located in Grand View, Idaho.

Sincerely,

ECOLOGY AND ENVIRONMENT, INC.

Jeffrey Fowlow
Project Leader

cc: Gary Sink, EPA, Region 10 (letter only)
William Carberry, E & E, Seattle (letter only)

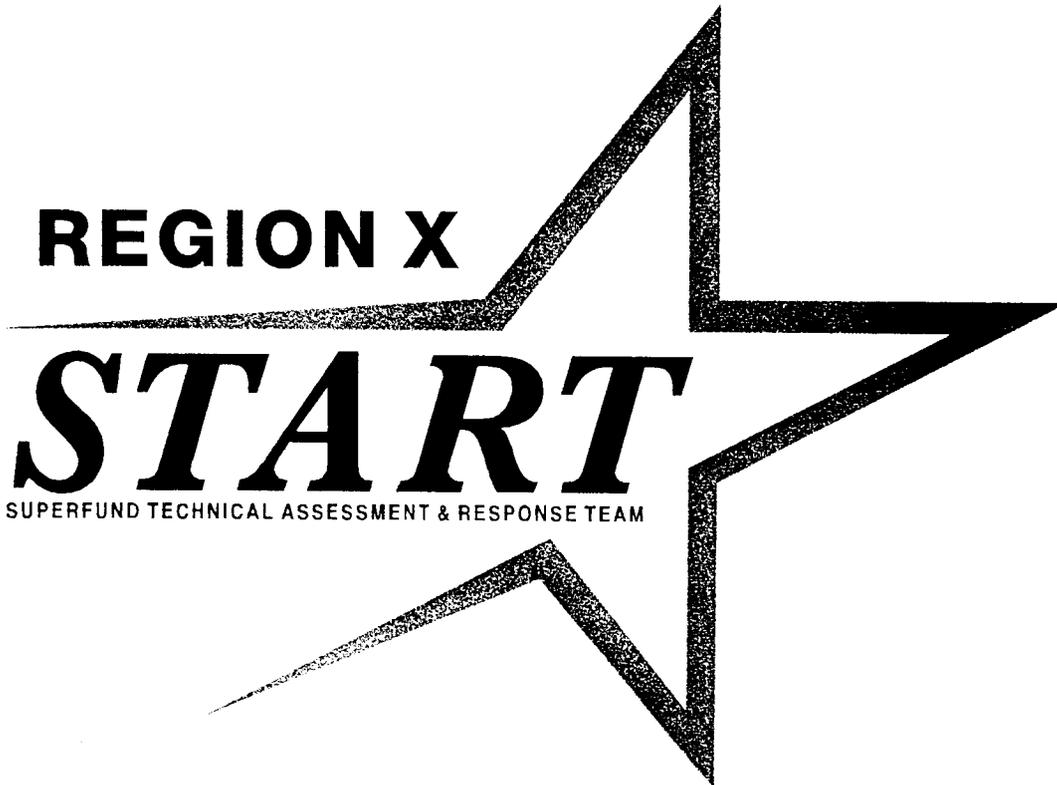
JEK/jw

**PRELIMINARY ASSESSMENT
SIMPLOT FEEDLOT DUMP**

TDD: 96-03-0022

Contract No: 68-W6-0008

June 12, 1996



Prepared for:



EPA

Office of Environmental Cleanup
Region X

Monica Tonel
Task Monitor

Prepared by:



ecology and environment, inc.

Seattle, Washington (206) 624-9537

Jennifer Kindred
Project Manager

PRELIMINARY ASSESSMENT
FINAL REPORT
SIMPLOT FEEDLOT DUMP SITE
GRAND VIEW, IDAHO

START REGION X

Contract No. 68-W6-0008
Technical Direction Document No. 96-03-0022

June 1996

Prepared By:

ECOLOGY AND ENVIRONMENT, INC.
1500 First Interstate Center
999 Third Avenue
Seattle, Washington 98104

Prepared For:

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

PRELIMINARY ASSESSMENT
FINAL REPORT
SIMPLOT FEEDLOT DUMP SITE
GRAND VIEW, IDAHO

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1.0 INTRODUCTION

Ecology and Environment, Inc., (E & E) has been tasked by the U.S. Environmental Protection Agency (EPA) to provide technical support for completion of a Preliminary Assessment (PA) at the Simplot Feedlot Dump (Simplot) site in Grand View, Idaho. E & E completed PA activities under Technical Direction Document No. 96-03-0022, issued under EPA Region X Superfund Technical Assessment and Response Team (START) Contract Number 68-W6-0008. The specific goals for the Feedlot PA identified by EPA are presented below:

- Determine the potential threat to public health or the environment posed by the site;
- Determine the potential for a release of hazardous constituents into the environment; and
- Determine the potential for placement of the site on the National Priorities List.

Completion of the PA included reviewing existing site information, collecting receptor information within the range of site influence, and determining regional characteristics. This document includes a discussion of background site information ([Section 2](#)); a discussion of migration/exposure pathways and potential receptors (targets) ([Section 3](#)); and a list of pertinent references ([Section 4](#)).

2.0 SITE BACKGROUND

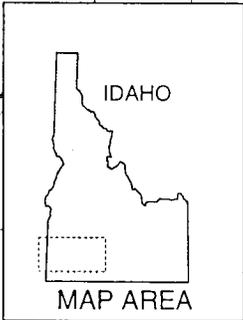
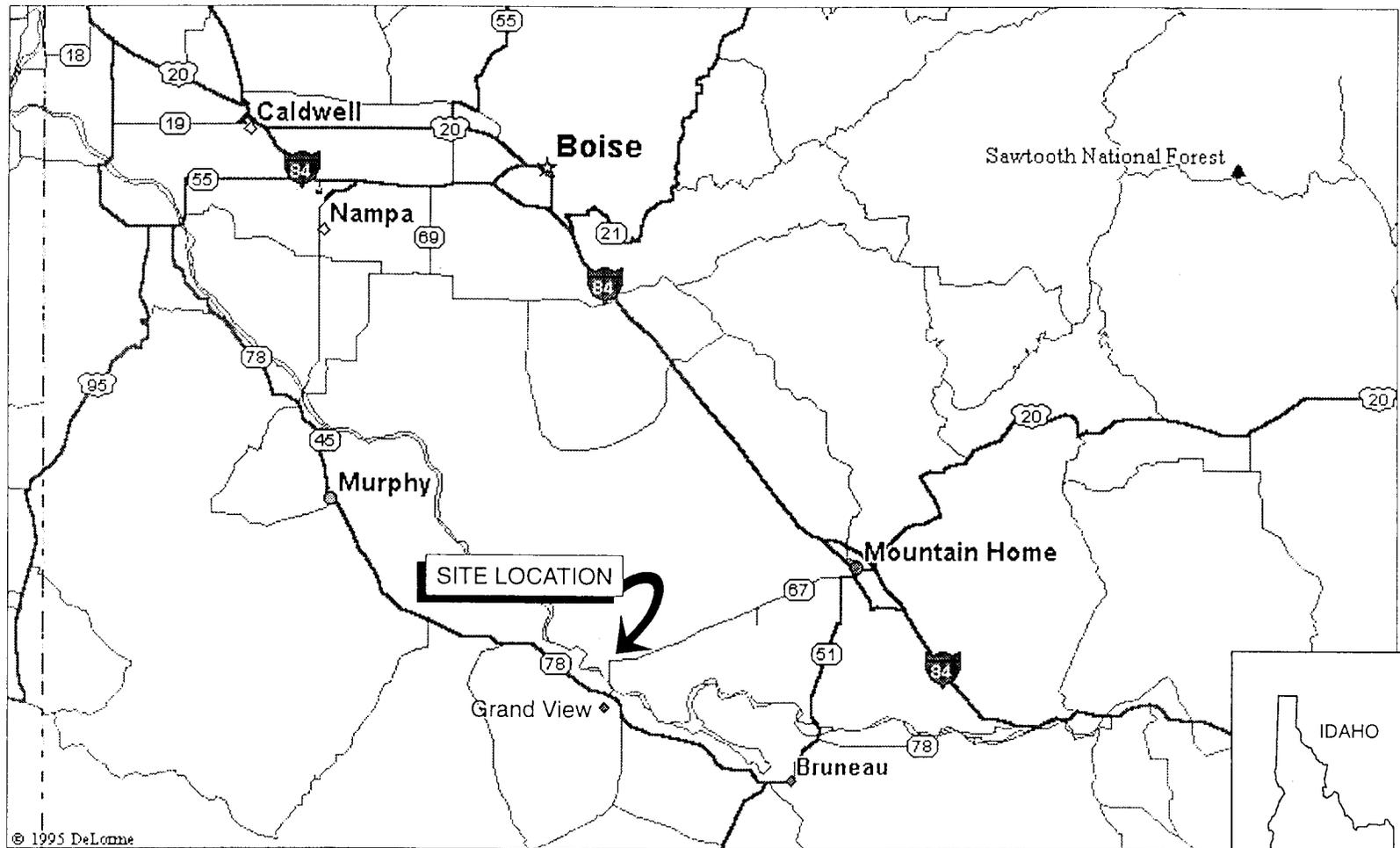
2.1 SITE LOCATION

Site Name: Simplot Feedlot Dump
CERCLIS ID No.: ID6141100093
Location: Grand View, Idaho
Latitude: 43° 2' 22.6" North
Longitude: 116° 4' 40.9" West
Legal Description: Section 26 W1/2 SW SW, Township 4 South, Range 3 East
Site Owner: J.R. Simplot Company
H.C. 85
P.O. Box 275
Grand View, Idaho 83624
(208) 834-2231
Site Contact: Ron Parks, Central Area Manager
Simplot Livestock Company
20875 Wagner Road
Caldwell, Idaho 83605
(208) 454-4263

2.2 SITE DESCRIPTION

The Simplot Feedlot Dump is a former waste insecticide container disposal area located approximately 4 miles north of Grand View, Idaho, in the South half of Section 26, Township 4 South, Range 3 East (Figure 2-1). The Simplot Feedlot Dump site is located at the base of a bluff in a bluff ravine. An area formerly used to dispose of waste insecticide containers is located on approximately 2 acres of moderately sloping terrain (Figure 2-2). The site is bounded by a bluff on the west/northwest and the east and by barren land on the north and south. Cattle feedlots are located approximately 1/2 mile south of the site.

The site property is currently owned by the J.R. Simplot Company, which has operated the Simplot Livestock Company (Simplot) (a large cattle feedlot and agricultural farm) at this location since



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**SIMPLOT FEEDLOT DUMP
 GRAND VIEW, IDAHO**



NO SCALE USED

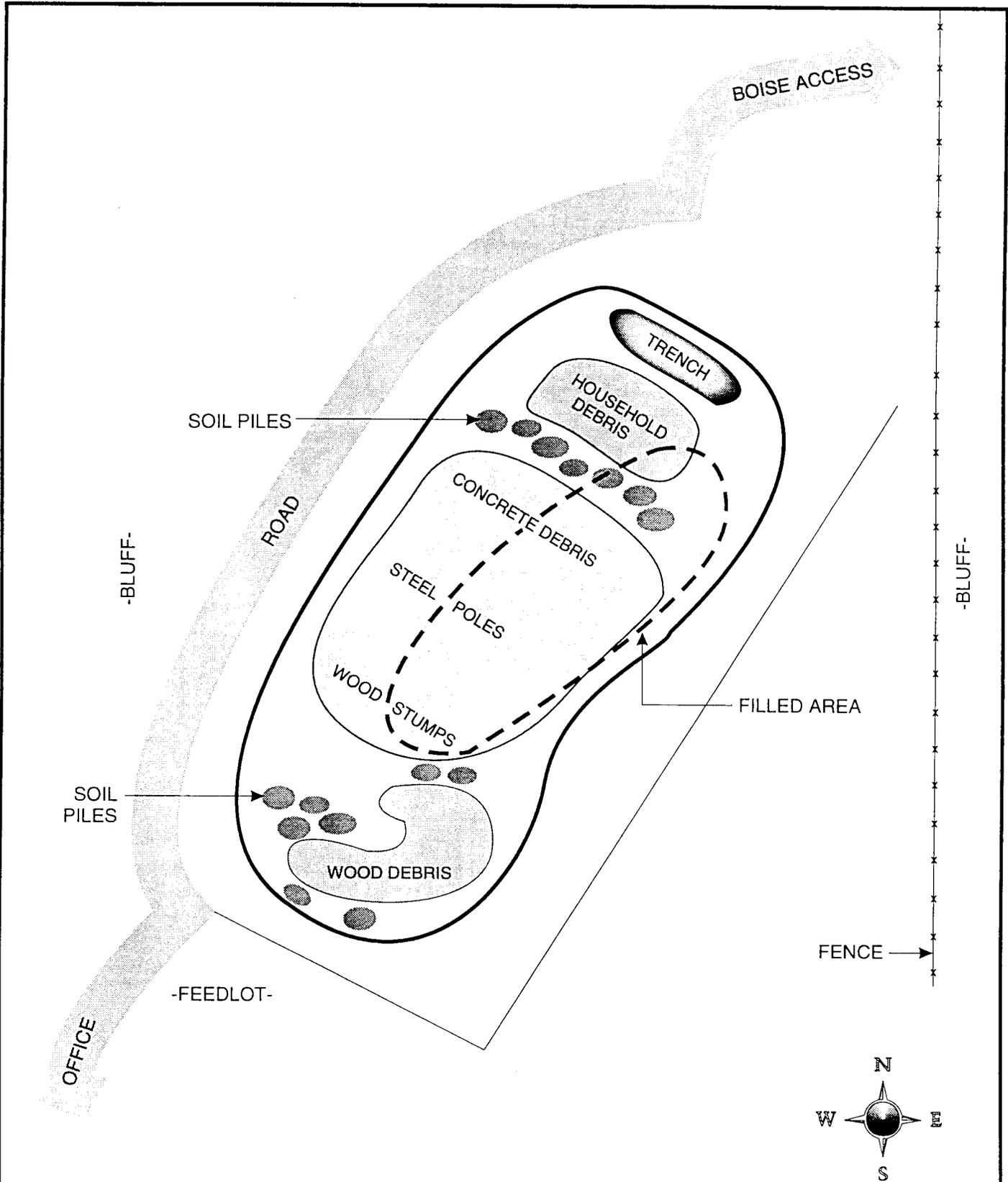
**Figure 2-1
 SITE LOCATION MAP**

Drawn By:
 MRE

Date
 06-04-96

IDD/Job No.
 96-03-0022

Dwg. No.
 KJ0100



NOT TO SCALE



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SIMPLOT FEEDLOT DUMP
 GRAND VIEW, IDAHO

Figure 2-2
 SITE MAP

Drawn By: MRE	Date 06-03-96	TDD/Job No. 96-03-0022	Dwg. No. KJ0100
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the 1950's. The J.R. Simplot Company leased this property from the Bureau of Land Management until 1988, when the J.R. Simplot Company took ownership.

The site originally consisted of an area where extensive soil removal had occurred up to 10 feet in depth (IDEQ 1989). Excavated soil was used for feedlot fill. The resulting pits were used to dispose of refuse from the feedlot operations and domestic waste from employee homes. The site is accessed via a north/south trending, rough dirt road that traverses the ravine. A fence is present along the east side of the site.

2.3 SITE OPERATIONS AND WASTE CHARACTERISTICS

Disposal operations at the dump, used by Simplot, were initiated in 1955. Reportedly, no household waste or hazardous materials are currently being disposed of, or have been disposed of, at the dump since 1988 (Parks 1996). According to previous inspection reports the dump site contained improperly disposed insecticide containers labeled "CO-RAI", an insecticide used on cattle to repel insects (IDEQ 1989). During a site inspection conducted in late 1988, four 2-1/2 gallon waste insecticide containers were observed at the dump site (IDEQ 1989). The insecticide containers were not rinsed and contained residual amounts of product. CO-RAI is a moderately toxic insecticide that is not highly persistent. At the time of the inspection it was reported that approximately 100 gallons of insecticide were used at the facility per year for cattle dipping purposes. Based on a container size of 2-1/2 gallons, it is estimated that approximately 40 containers per year of insecticide were used at the facility. From this information, it is estimated that 1,320 insecticide containers have been used over the period of disposal operations (40 containers X 33 years). Based on an average insecticide residue per container of 1/4 cup (Lucky 1989), it is estimated that 20 gallons of product may have been disposed in the dump over the period of disposal operations.

In addition to the waste insecticide containers, waste materials present or known to have been present at the dump prior to 1988 include waste vehicle crankcase oil, dead cattle, animal waste, concrete slabs, scrap metal, and wood scraps (Lucky 1989). According to Mr. Ron Parks, the Central Area Manager for Simplot, the dump is currently being used to dispose of tree stumps and concrete from the feedlot.

2.4 SITE INVESTIGATIONS

In November 1988, the Bureau of Land Management, Boise District Office, conducted a survey of a suspected illegal dump site on public lands located in Section 27 lots 1 and 2 (SE SE and SW SE) of Township 4 South, Range 3 East. This area is located to the west of the Simplot Feedlot dump site. The investigators observed a large pit used for trash disposal and loose trash strewn over public lands adjacent to the pit. They also observed tractors towing tank trailers containing animal waste and dumping the waste onto

the public lands. Further, the investigators observed animal waste flowing approximately 500 yards in a ditch on public lands which appeared to have been excavated for this purpose (Tomich 1988).

In January 1989, the Idaho Division of Environmental Quality (IDEQ), Department of Health and Welfare, conducted an evaluation of the Simplot Feedlot Dump site in order to determine if the site presented an environmental or public health risk and whether response actions under CERCLA were appropriate (IDEQ 1989). During this evaluation, an IDEQ Hazardous Materials Specialist observed waste vehicle crankcase oil, dead cattle, animal waste, empty pesticide containers, concrete slabs, scrap metal and wood scraps at the site (IDEQ 1989). No environmental sampling was conducted at this time. The evaluation concluded there was no evidence to suggest that hazardous wastes or contaminants were present at the facility in such form and quantity that it would pose a potential significant risk to the environment or public health (IDEQ 1989).

In September 1989, the IDEQ, Hazardous Materials Bureau, conducted a preliminary assessment (PA) of the unauthorized landfill on BLM property used by Simplot (IDEQ 1989). Environmental sampling was not conducted at this time. The report noted that the only recorded pesticide found at the site was CO-RAL. At the time of the PA, the refuse and pits were covered with soil. The PA report concluded that due to low average annual rainfall, soil conditions, and depth to ground water, the only apparent pathway for contamination would be by direct contact or by gas emitting from the site, with the latter being the primary concern (IDEQ 1989).

On May 9, 1996, a site visit was conducted by the START as a part of this PA. At this time, the START observed a disposal area of approximately 5 acres containing household debris, concrete, soil piles, wood stumps, and animal waste. The START also estimated by visual observation that the size of the dump containing waste pesticide containers (among other debris) was approximately 2 acres. The remaining approximate 3 acres appeared to contain tree stumps, concrete, and other non-hazardous debris.

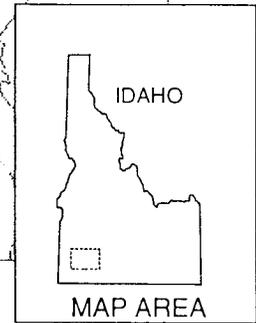
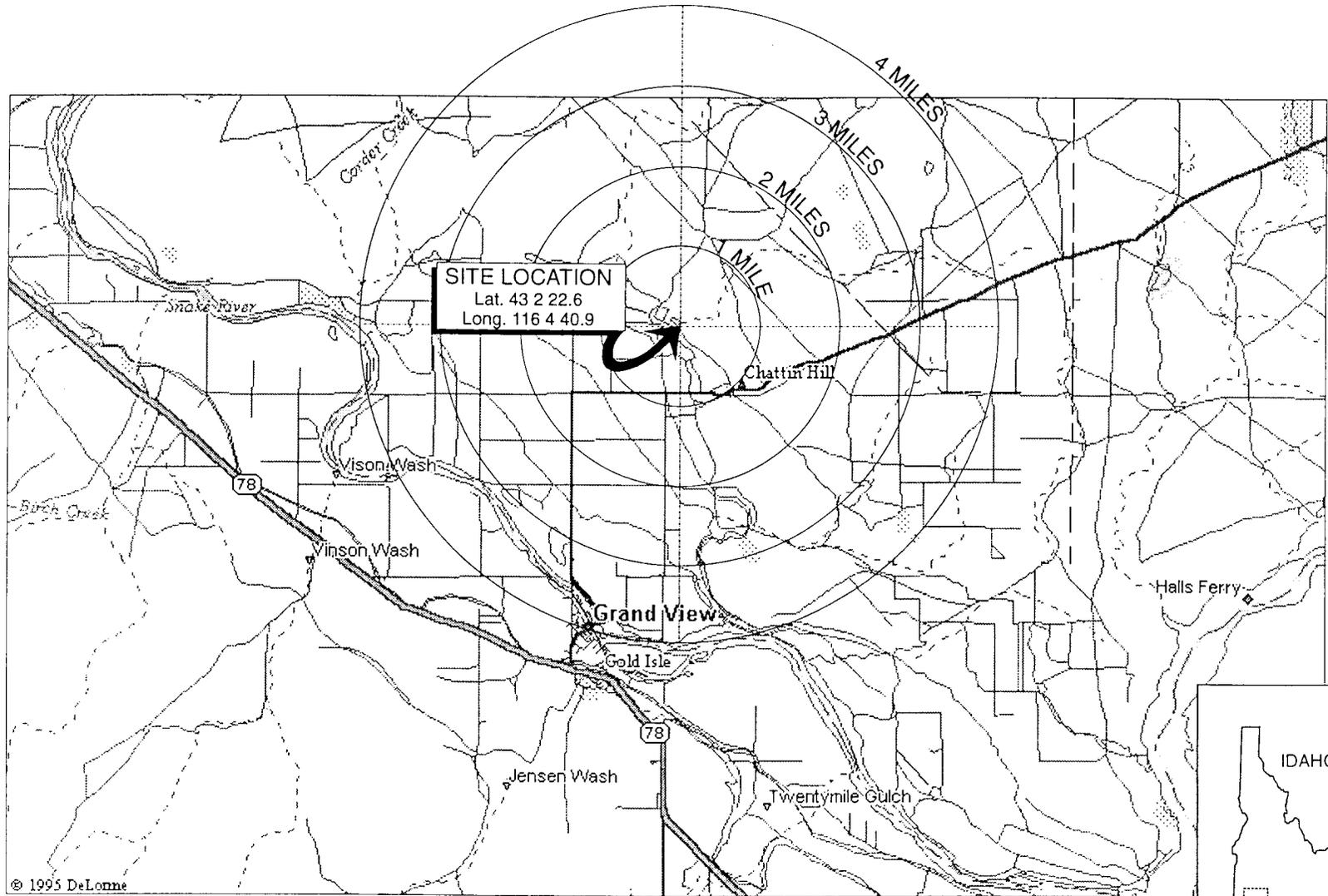
3.0 MIGRATION/EXPOSURE PATHWAYS AND TARGETS

The following sections describe migration/exposure pathways and potential targets within the site's range of influence (Figure 3-1).

3.1 GROUNDWATER MIGRATION PATHWAY

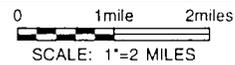
The site is located in the western portion of the Snake River Basin which contains a number of geologic units. The floor of the western Snake River Basin consists primarily of flood plain deposits (alluvium), comprised of unconsolidated to well compacted clay, silt, sand, gravel, and boulders. This material is up to 250 feet thick and is underlain by an extensive body of basalt, primarily rocks of the Snake River Group. The Olivine basalt of the Snake River Group is more than 4,000 feet thick at some places and is comprised of basaltic cinders, rubbly basalt, and interflow sedimentary rocks. It is also mantled in many places with alluvium, terrace gravel, and windblown deposits. The Snake River Group is underlain by the Idaho group, consisting of the Bruneau Formation (similar in composition to the Olivine basalts in the Snake River Group), the Glens Ferry Formation, the Chalk Hills Formation, and the Poison Creek formation. The latter three formations consist of subaerial and lake deposits of compacted to poorly consolidated clay, silt, sand, and gravel and are greater than 5,500 feet thick in depth. The Idaho Group is underlain by the Idavada Volcanics, a several thousand foot layer consisting of massive and dense rhyolitic, latitic, and andesitic rocks. These formations occur as thick flows and blankets of welded tuff with associated fine- to coarse-grained ash and pumice beds and clay, silt, sand, and gravel. The Idavada Volcanics are underlain by the Payette Formation, similar in composition to the older alluvium of the Idaho Group, and an unnamed group of undifferentiated rocks, including rhyolite, tuffs, andesite, basalt, and sedimentary rocks. Finally, the unnamed group is underlain by undifferentiated volcanic rocks, chiefly Challis Volcanics, greater than 5,000 feet thick. These volcanic rocks range in composition from rhyolite to basalt, and include welded tuff, pyroclastic, tuffaceous, and other clastic and sedimentary rocks. Beneath the Challis Volcanics are primarily granitic rocks of the Idaho batholith of an unknown thickness, and well-indurated sedimentary and metamorphic rocks greater than 12,000 feet thick that have been folded, faulted, and intruded by igneous rocks (Whitehead 1986).

Sandy and gravelly alluvium yields moderate to large quantities of water to wells, with specific capacities ranging from 20 to 100 gallons per minute per foot [(gal/min)/ft] (Whitehead 1986). This unconsolidated alluvium is an important aquifer in the western Snake River plain (Whitehead 1986). Most of the wells in the area draw from this unit (IDWR 1996). Younger Olivine basalt is also an



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**SIMPLOT FEEDLOT DUMP
 GRAND VIEW, IDAHO**



**FIGURE 3-1
 SITE RANGE OF INFLUENCE**

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important aquifer, especially in the eastern portion of the Snake River plain, with capacities of 500-1,000 (gal/min)/ft. (Whitehead 1986). The older consolidated alluvium, below the younger unconsolidated alluvium in some areas and below the Olivine basalt in other areas of the western plain, is also an important aquifer. The older alluvium generally contains water under confined conditions; with yields to wells ranging from a few gallons per minute from clayey beds to several hundred gallons per minute from sand and gravel beds. Specific capacities range from 5 to 60 (gal/min)/ft. (Whitehead 1986). The water table in the Snake River Basin is generally greater than 6 feet below ground surface (bgs) (SCS 1991).

Groundwater systems underlying the western Snake River plain are recharged by deep percolation of excess irrigation water, leakage from canals, seepage from streams flowing onto and over the plain, underflow from tributary basins and highlands bordering the plain, and direct precipitation over the plain (Goodell 1986). The lower-level aquifers in the volcanic and sedimentary rocks of the basin are recharged by underflow from tributary alluvial valleys; water in these lower aquifers is under artesian pressure. The upper aquifers are recharged from precipitation and excess irrigation water (Ross, Savage 1967). Major components of groundwater discharge are spring flow to the Snake River, seepage to rivers, underflow, groundwater pumpage, and evapotranspiration (Goodell 1986). Annual discharge in the western plain is about 2 million acre-feet (Goodell 1986). Groundwater is used to irrigate commercial food crops and for livestock consumption (USGS 1986). The site is not in a wellhead protection area (EPA 1996).

The nearest private drinking water well is located approximately 1 mile south of the Simplot Feedlot dump site. This well was installed in 1977 to a depth of 78 feet, with the static water level at 58 feet bgs. The probable direction of groundwater flow in the vicinity of the site is to the southwest (USGS 1992). Fifteen other domestic wells are located within a 4-mile radius of these site. These wells are installed in the alluvial deposits and range in depth from 40 to 430 feet (IDWR 1996).

There are no public drinking water wells within a 4-mile radius of the site (Nielson 1996). Domestic wells within a 4-mile radius of the site are listed in [Table 3-1](#). Populations using each well are assumed to be the county average population per household (2.81 persons per household) (BOC 1990).

Table 3-1		
GROUNDWATER DRINKING WATER POPULATION WITHIN A 4-MILE RADIUS		
Distance (Miles)	Number of Domestic Wells	Domestic Well Population^a
0 - 1/4	0	0
1/4 - 1/2	0	0
1/2 - 1	1	3
1 - 2	6	17
2 - 3	3	8
3 - 4	6	17
Total		45

^aPopulation figures are based on Elmore County average of 2.81 persons/household/well (BOC 1990).

Sources: IDWR 1996; USGS 1992; BOC 1990.

3.2 SURFACE WATER MIGRATION PATHWAY

The site is located approximately 3 miles northeast of the Snake River (USGS 1992). A topographic map indicates surface water runoff from the site discharges to the High Line irrigation canal, located approximately 1/2 mile downgradient of the site (USGS 1992). The nearest probable point of entry for surface water runoff to the irrigation canal is also approximately 1/2 mile from the site (USGS 1992). The site is not located in a floodplain (Eisenbarth 1996).

The 2-year, 24-hour rainfall event for the area of the site is 0.85 inch (Ashbey 1996). The average annual rainfall for the Grand View area is 7.26 inches (Goodall 1986). The upgradient drainage area of the site is estimated from a topographic map to be approximately 55 acres (USGS 1992).

Soils in the area of the site are classified as Trevino-Garbutt-Weso complex, 2 to 8 percent slopes. This consists of 40% Trevino soil and similar inclusions, 20% Garbutt soils and similar inclusions, 20% Weso soil and similar inclusions, and 20% contrasting inclusions. Typically, soils of the Trevino classification consist of a surface layer that is pale brown stony loam about 5 inches thick. The upper part of the underlying material is pale brown loam about 7 inches thick, and the lower part to a depth of 18 inches is very pale brown fine sandy loam. Fractured bedrock is typically found at 18 inches. This soil is well drained, low in depth, with moderate permeability and low available water capacity. The typical profile of the Garbutt soil type consists of light brownish gray silt loam about 5 inches thick. The underlying material to a depth of 60 inches is light gray very fine sandy loam. Garbutt soils are typically very deep, well drained, with moderate permeability and high available water capacity. The Weso soil type typically consists of a surface layer that

is pale brown loam about 5 inches deep. The underlying material is very pale brown loam from 5 to 19 inches in depth, very pale brown fine sandy loam with pockets of cemented material (hardpan) from 19 to 24 inches, very pale brown loam from 24 to 30 inches, and light gray sandy loam from 30 to 60 inches in depth. The Weso soils are typically very deep, well drained, with moderate permeability and high available water capacity (SCS 1991).

Below Grand View, the Snake River is entrenched and there is little irrigation along this reach (Goodell 1986). Three canals, the High Line Canal, the Low Line Canal, and the Grand View District Irrigation Canal, divert water from the Snake river upstream of the site. The High Line Canal runs parallel to the Snake River (USGS 1992) and converges with the Snake River via Corder Creek approximately 4 miles downstream from the probable point of entry (USGS 1992). The High Line Canal is used for livestock and commercial food crop irrigation (USGS 1986). All other surface water intakes located within 15 miles downstream of the site are used for food crop irrigation or stock watering (IDWR 1996). The average flow rate of the Snake River is 15,590 cubic feet per second (USGS 1986). The Snake River is used for recreational boating.

Fish catch figures for the Snake River and Corder Creek could not be obtained. No state- or federally-listed threatened or endangered species are known to exist within 15 miles downstream of the site (Stephens 1996). The Snake River Birds of Prey Natural Area surrounds the site (USGS 1992). The area contains nesting habitat for raptors and for prey animals (Stephens 1996). It is estimated from National Wetland Inventory maps that 4 miles of wetland river frontage exist along the High Line irrigation canal, one mile along Corder Creek, and 9 miles along the Snake River within 15 miles downstream of the site (USF&WS 1991, USF&WS 1992).

3.3 SOIL EXPOSURE PATHWAY

The site is located in a rural area. The nearest residence is located approximately 1/2 mile from the site (EPA 1996). Land surrounding the site is primarily used for agriculture or livestock grazing. Simplot employs approximately 125 workers, but no employees work on or within 200 feet of the dump site on a regular basis (Parks 1996). The dump site is fenced along the eastern edge and is bordered by a high bluff on the north and west. The site is accessible via a rough dirt road that traverses the ravine from the feedlots. There are no daycare facilities or schools within 200 feet of the site (Parks 1996). Populations within a 1-mile radius of the site are provided in [Table 3-2](#).

Table 3-2	
POPULATIONS WITHIN A 1-MILE RADIUS	
Distance Ring	Population
0 - 1/4 mile	0
1/4 - 1/2 mile	1
1/2 - 1 mile	5
Total	6

Source: EPA 1996

3.4 AIR MIGRATION PATHWAY

It is estimated that there are 6 residents within 1 mile of the site (EPA 1996). A total of 461 people live within 4 miles of the site (EPA 1996). The Snake River is used for recreational boating.

No sensitive environments are known to occur within 1/2 mile of the site. Nesting territory of the Ferruginous hawk (*buteo regalis*), a federal candidate and a state-listed sensitive species, has been documented within 1/2 - 1 mile of the site (Stephens 1996). The White-Margined wax plant (*glyptopleura marginata*), a state-listed sensitive plant species, is located within 1-2 miles of the site (Stephens 1996). The following sensitive environments have been documented between 2 - 3 miles of the site: wintering area for the Bald eagle, a federally-listed threatened species; and colonial nesting areas for the California gull (*Larus californiensis*) and the ring-billed gull (*Larus delawarensis*), both state protected species (Stephens 1996). Within 3 - 4 miles of the site the following sensitive environments have been documented: colonial nesting areas for the double-crested cormorant (*Phalacrocorax auritus*) and the black-crowned night heron (*Nycticorax nycticorax*), both state protected species (Stephens 1996).

The Snake River Birds of Prey Natural Area is located on land surrounding the site (USGS 1992). The area contains nesting habitat for raptors and for prey animals (Stephens 1996). The Ted Trueblood Wildlife area, originally set aside in 1948 as a bird refuge by the Idaho Department of Fish and Game (IDFG), is located approximately three miles southwest of the site (USGS 1992). Approximately 278 acres are currently managed by the IDFG and the Bureau of Land Management principally for wildlife use and as a public recreation area in connection with migratory and upland birds. Approximately 258 acres of wetlands exist within 4 miles of the site (USGS 1991; USGS 1992). **Table 3-3** provides populations and wetland acreage by distance ring within 4 miles of the site.

Table 3-3		
POPULATIONS AND WETLAND ACREAGE WITHIN A 4-MILE RADIUS		
Distance (Miles)	Residents	Wetland Acreage
On a source	0	0
0 - 1/4	0	0
1/4 - 1/2	1	1
1/2 - 1	5	4
1 - 2	49	3
2 - 3	59	50
3 - 4	347	200
Total	461	258

Source: EPA 1996; USF&WS 1991; USF&WS 1992

4.0 REFERENCE LIST

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- Eisenbarth, Fred, Idaho Department of Water Resources, telephone conversation with Jennifer Kindred, Ecology and Environment, Inc., May 20, 1996, regarding floodplain information from Federal Emergency Management Agency Floodplain Maps.
- Goodell, S.A., 1986, Water Use on the Snake River Plain, Idaho and Eastern Oregon, Open-File Report 85-559.
- Idaho Department of Environmental Quality (IDEQ), Hazardous Materials Bureau, September 1989, Simplot Cattle Company, Unauthorized Landfill on BLM Property, Preliminary Assessment Report.
- Idaho Department of Water Resources (IDWR), April 17, 1996, Adjudication Claim Profile Reports.
- Lucky, Mike, Idaho Division of Environmental Quality, Health and Welfare Department, Hazardous Materials Specialist, January 11, 1989 memorandum to Karl Gebhardt, Bureau of Land Management, regarding Simplot Feedlot Dump.
- Nielson, Leon, Grand View Water and Sewer Association, responses to May 14, 1996 letter from Jennifer Kindred, Ecology and Environment, Inc. regarding public drinking water wells.
- Parks, Ron, Simplot Livestock Company, Central Area Manager, personal communication with Jennifer Kindred, Ecology and Environment, Inc., during site visit conducted on May 9, 1996.
- Ross, Sylvia H. and Carl N. Savage, July 1967, Idaho Earth Science, Idaho Bureau of Mines and Geology, Moscow, Idaho.
- Stephens, George, Fish and Game Data Coordinator, Idaho Department of Fish and Game, Idaho Conservation Data Center, May 31, 1996 letter to Jennifer Kindred, Ecology and Environment, Inc., regarding threatened and endangered species in the project area.
- Tomich, Dan, John Ryan and Cindy Fritz, Bureau of Land Management, Boise District Office, November 29, 1988 memorandum to Monte McClendon regarding disposal of waste on public lands.
- U.S. Department of Agriculture, Soil Conservation Service (SCS), May 1991, Soil Survey of Elmore County Area, Idaho.
- U.S. Department of Commerce, Bureau of the Census, 1990, General Population and Housing Characteristics, Elmore County, Idaho, CPH-1-14.
- U.S. Environmental Protection Agency (EPA), April 10, 1996, Site Information Query System, Simplot Feedlot Dump, Idaho.

REFERENCES, Cont.

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_____, 1992, National Wetland Inventory map, Grand View, Idaho, quadrangle.

U.S. Geological Survey (USGS), 1986, Water Resources Data, Idaho.

_____, 1992, 7.5 minute series topographic maps, Dorsey Butte, Grand View, and Jackass Butte, Idaho, quadrangles.

Whitehead, R.L., 1986, Geohydrologic framework of the Snake River Plain, Idaho and Eastern Oregon: U.S. Geological Survey Open-File Report 84-051, scale 1:1,000,000, 3 sheets.

ATTACHMENT A

REFERENCES

(Included in original report only)

ATTACHMENT B
PHOTOGRAPHIC DOCUMENTATION

PHOTOGRAPH IDENTIFICATION SHEET

Camera Serial #: Minolta X-370N

TDD #: 96-03-0022

Lens Type: 50 mm Lens

Site Name: Simplot Feedlot Dump PA

Photo No.	Date	Time	By	Description
1-1	5/9/96	1018	JF	Overview of dump area, facing S.
1-2r	5/9/96	1018	JF	Overview of dump area, facing SSE.
1-3	5/9/96	1018	JF	Overview of dump area, facing SE.
1-4	5/9/96	1018	JF	Overview of dump area, facing E.
1-5	5/9/96	1031	JF	Trench with general waste; manure stain and liquid, facing SE.
1-6	5/9/96	1032	JF	Trench; fresh burial of household debris, facing W.
1-7	5/9/96	1035	JF	55-gallon drum labeled "Shell Grease", facing N.
1-8	5/9/96	1038	JF	Concrete debris, facing S.
1-9	5/9/96	1043	JF	Wood debris, facing N.

JF - Jeff Fowlow